

Exhibit K1

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***** C O N F I D E N T I A L *****

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

- - -

EASTERN PROFIT CORPORATION,)	
LIMITED,)	
)	
Plaintiff/Counterclaim Defendant,)	
)	
v.)	Case No.
)	18-cv-2185
STRATEGIC VISION US, LLC,)	(JGK)
)	
Defendant/Counterclaim Plaintiff.)	
-----)	

DEPOSITION OF

LIANCHAO HAN

WASHINGTON, D.C.

AUGUST 28, 2019

ATKINSON-BAKER, INC.
(800) 288-3376
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REPORTED BY: CATHERINE B. CRUMP
FILE NO. AD07997

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1	Q. After you came to the U.S., maybe if you	09:19	1	that you are a speaker and writer about U.S.-Chinese	09:23
2	just could walk us through your career since you've	09:19	2	relations?	09:23
3	been here.	09:19	3	A. Correct.	09:23
4	A. I went to a year of law school and I	09:19	4	Q. And you follow domestic politics in	09:23
5	didn't quite -- I finished a program, but when the	09:19	5	China as well?	09:23
6	Tieneman Square massacre occurred and I become a	09:19	6	A. Correct.	09:23
7	student leader in this country, we organized protests	09:20	7	Q. If I were to ask you what Chairman --	09:23
8	against China's crackdown, and about 300 universities	09:20	8	well, let me back up for a second.	09:23
9	in this country, the Chinese student scholars formed	09:20	9	Who is the president of China?	09:23
10	a group that elected me as their first vice	09:20	10	A. Xi Jinping.	09:23
11	president. So we carried out the pro-democracy	09:20	11	Q. Is he also the chairman of the Chinese	09:23
12	protest of, you know, Chinese students in this	09:20	12	Communist Party?	09:23
13	country and, also, we prepared ourself for to	09:20	13	A. Yes.	09:23
14	practice democracy and to learn how democracy works	09:20	14	Q. Have you heard of a program of his	09:23
15	here and, meanwhile, we lobby U.S. Congress, U.S.	09:20	15	called China Dream?	09:23
16	Government, for a tougher human rights policy against	09:20	16	A. Yes.	09:23
17	China.	09:21	17	Q. What is that?	09:23
18	So after, I did that work in Washington, D.C.	09:21	18	A. It is his idea. It's rhetoric about	09:23
19	for about a year and I worked in the U.S. Senate for	09:21	19	rejuvenating the nationalism of China. That's	09:23
20	about 12 years. I worked for three different	09:21	20	basically what it is.	09:23
21	Senators, served as a staff attorney, staff	09:21	21	Q. Okay. And what does rejuvenating of the	09:23
22	legislative counsel, and policy director. After	09:21	22	nationalism of China entail, more specifically?	09:24
Page 10			Page 12		
1	that, I went back to finish my Ph.D., and after	09:21	1	A. More specifically --	09:24
2	Ph.D., I went back to community college to study	09:21	2	MR. GAVENMAN: Objection to form.	09:24
3	science and went to John Hopkins to get another	09:21	3	THE WITNESS: Huh?	09:24
4	master's degree in biotechnology, and when Liu	09:21	4	MR. GAVENMAN: I said objection to form.	09:24
5	Xiaobo, we promoted Liu Xiaobo to get the Nobel Peace	09:21	5	THE WITNESS: It's, basically, you know, make	09:24
6	Prize, and after that, I feel that we want to	09:21	6	China the greatest country in the world.	09:24
7	organize to run Liu Xiaobo.	09:22	7	BY MR. GREIM:	09:24
8	So I joined a human rights group called	09:22	8	Q. Does that entail competition with the	09:24
9	Citizens for Initiative for China and I served as the	09:22	9	United States?	09:24
10	vice president of the group until now. I'm still the	09:22	10	A. Absolutely.	09:24
11	vice president of the group. So we basically lobby	09:22	11	Q. Does it involve undermining United	09:24
12	Congress, educate American general public about China	09:22	12	States' interests?	09:24
13	and about, you know, for improved democracy for human	09:22	13	A. Of course.	09:24
14	rights.	09:22	14	Q. Now, I take it, based on the background	09:24
15	Q. Now, is it true -- I mentioned earlier	09:22	15	that you've just given us, that one of your goals is	09:24
16	that you're an attorney. You're a patent attorney;	09:22	16	not to advance President Xi's goals. Am I right	09:24
17	is that right?	09:22	17	about that?	09:24
18	A. Correct.	09:22	18	MR. GREIM: Object to the form.	09:24
19	Q. Do you have any patents?	09:22	19	THE WITNESS: Yes.	09:24
20	A. I didn't myself. I didn't get a chance	09:22	20	MR. GREIM: Okay. Brief interlude: I want	09:25
21	to file.	09:22	21	to mark as Exhibit 1 a production I received from	09:25
22	Q. Okay. Okay. Is it also fair to say	09:22	22	your counsel in the wee hours.	09:25
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1	[Han Exhibit No. 1 was	09:25	1	A. No.	09:27
2	marked for identification.]	09:25	2	Q. No. Why did you set your --	09:27
3	BY MR. GREIM:	09:25	3	A. I was searching for all the text	09:27
4	Q. I'll show you what's been marked as Han	09:25	4	messages and I noticed my Signal with Mike and French	09:27
5	Exhibit 1, and you'll see it starts off with a letter	09:25	5	is not set correctly. Sometimes, you know, it	09:27
6	from your attorney, Mr. Gavenman, that takes up the	09:25	6	changes. So I set it to 10 seconds.	09:27
7	first two pages and then there are a total of four	09:25	7	Q. What was it set to before 10 seconds?	09:27
8	Bates-labeled pages. Do you see that?	09:25	8	A. Before, I set it usually automatically	09:27
9	A. Yeah.	09:25	9	just erase it after read.	09:28
10	Q. Are those four pages the documents that	09:25	10	Q. Did you have any communications with Mr.	09:28
11	you gave to your attorney to produce to me?	09:25	11	Guo that you did not produce?	09:28
12	A. Yes.	09:25	12	A. No. With Mr. Guo, we don't use Signal.	09:28
13	Q. And the redaction, I take it, is just	09:25	13	Q. What do you use to communicate with Mr.	09:28
14	your communication with your counsel about what is	09:26	14	Guo?	09:28
15	below; is that right?	09:26	15	A. With What's App. WhatsApp, I also	09:28
16	A. Yes.	09:26	16	automatically to delete it whenever I read the	09:28
17	Q. Okay. Now, this morning, you also	09:26	17	message. Can I add?	09:28
18	produced a folder of hard copy documents; is that	09:26	18	MR. GAVENMAN: Sure.	09:28
19	right?	09:26	19	BY MR. GREIM:	09:29
20	A. Yes.	09:26	20	Q. Sure.	09:29
21	Q. Okay. We are looking at those and we'll	09:26	21	A. For this particular project, at the very	09:29
22	cover those later after we have a chance for a break.	09:26	22	beginning, we all agreed we're not -- everything has	09:29
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1	Okay?	09:26	1	to be in person, face-to-face meeting, no digital	09:29
2	A. Okay.	09:26	2	transmission of any sort of documents.	09:29
3	Q. I want to ask you do you have -- I have	09:26	3	Q. And why was that?	09:29
4	mentioned to your counsel the other day that I	09:26	4	A. Because everybody agreed to keep secret.	09:29
5	thought you may have text messages. Did you search	09:26	5	So we don't communicate on the digital platform	09:29
6	for and find any text messages or Signal messages	09:26	6	whatsoever.	09:29
7	with either Ms. Wallop or Mr. Waller?	09:26	7	Q. However, do you recall that, in fact,	09:29
8	A. All the messages are deleted. It said	09:26	8	some text communications did occur between you and	09:29
9	automatically deleted. I don't have any.	09:26	9	Ms. Wallop and Mr. Waller?	09:29
10	Q. Now, I will represent to you that when	09:26	10	A. I don't remember.	09:29
11	you use Signal and you change the settings on	09:27	11	Q. Okay.	09:29
12	there --	09:27	12	A. If there is, it must be very vague. I	09:29
13	A. Correct.	09:27	13	don't think we discussed that directly.	09:29
14	Q. -- it tells everybody else your	09:27	14	Q. Specifically, have you had	09:30
15	contacts.	09:27	15	communications with Ms. -- well, let me back up.	09:30
16	A. Yes.	09:27	16	Have you had communications with Mr. Guo about	09:30
17	Q. And so, yesterday, I believe we saw a	09:27	17	this case?	09:30
18	notice that you had changed the settings to 10-second	09:27	18	A. Let me think about this.	09:30
19	delete. Now, is that correct? Did you do that?	09:27	19	He called me on WhatsApp, blamed Mike and	09:30
20	A. That's correct.	09:27	20	French as a fraud, cheated him, and there was one	09:30
21	Q. But your testimony -- well, let me ask	09:27	21	situation, one time, that his supporters started	09:30
22	you. That's not what deleted the messages, is it?	09:27	22	about getting ready to attack me personally because I	09:31
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<p>1 introduced Mike and French to Miles. Miles feel like 09:31</p> <p>2 he is cheated by them. So when I learned the 09:31</p> <p>3 supporters are about to attack me personally, I sent 09:31</p> <p>4 him a message and I said how can you, you know, let 09:31</p> <p>5 your supporters do this to me. 09:31</p> <p>6 So he called me back and discussed and we 09:31</p> <p>7 argued, you know, for quite a while and then, you 09:31</p> <p>8 know, just ended that. He kept asking me who gave 09:31</p> <p>9 you that information, who tell you that my supporters 09:31</p> <p>10 are going to attack you personally. I said I won't 09:31</p> <p>11 be able to tell you that, and he pressured me many, 09:32</p> <p>12 many times. I refused to tell him. 09:32</p> <p>13 So when it ended, that's the only time we 09:32</p> <p>14 discussed this, and a few times when I was in his 09:32</p> <p>15 office, he mentioned about it as well, but we 09:32</p> <p>16 obviously have different views about our perception. 09:32</p> <p>17 Q. The longer discussion that you just 09:32</p> <p>18 testified to -- 09:32</p> <p>19 A. Yeah. 09:32</p> <p>20 Q. -- was this after the lawsuit was filed? 09:32</p> <p>21 A. I don't know when this lawsuit was 09:32</p> <p>22 filed. So I have no idea if it was before or after. 09:32</p> <p style="text-align: right;">Page 18</p>	<p>1 platform. 09:34</p> <p>2 Q. Have you received any sort of threats 09:34</p> <p>3 from Yvette Wang or Mr. Podhaskie, sitting here today 09:35</p> <p>4 on behalf of Golden Spring? 09:35</p> <p>5 A. No. 09:35</p> <p>6 MR. GRENDI: Objection to form. 09:35</p> <p>7 BY MR. GREIM: 09:35</p> <p>8 Q. Let me ask you have you had any 09:35</p> <p>9 communications with Mr. Podhaskie here before today? 09:35</p> <p>10 A. I did. 09:35</p> <p>11 Q. What were those communications? 09:35</p> <p>12 A. Mostly focused on the case against Clark 09:35</p> <p>13 Hill. He asked me -- he's bothering me, actually, 09:35</p> <p>14 about, you know, the case and I have been giving my 09:35</p> <p>15 accounts five, six times to different lawyers. I 09:36</p> <p>16 just got really tired of that. He pressured me for 09:36</p> <p>17 giving more. So that's why we were back and forth 09:36</p> <p>18 about it. 09:36</p> <p>19 Q. I'm sorry. What was the Clark Hill 09:36</p> <p>20 case? 09:36</p> <p>21 A. Clark Hill case is Miles is suing them, 09:36</p> <p>22 is about maybe suing them for his political asylum, 09:36</p> <p style="text-align: right;">Page 20</p>
<p>1 Q. Okay. Was it after the -- do you 09:32</p> <p>2 recall, at some point, there was a letter terminating 09:32</p> <p>3 the contract from the Foley, Hogue law firm? 09:32</p> <p>4 A. I didn't. 09:32</p> <p>5 Q. No? Do you recall if it was soon after 09:32</p> <p>6 the work on the project started -- stopped? 09:33</p> <p>7 A. That, I don't specifically remember. I 09:33</p> <p>8 think it must be a while after it stopped. 09:33</p> <p>9 Q. Did Mr. Guo deny to you that he had 09:33</p> <p>10 supporters who were going to attack you? 09:33</p> <p>11 A. He didn't deny it. 09:33</p> <p>12 Q. What do you mean when you say that 09:33</p> <p>13 supporters of Guo were going to personally attack 09:33</p> <p>14 you? 09:33</p> <p>15 A. At one point, I think Miles made a video 09:33</p> <p>16 to see. I assured him four times a hundred percent 09:34</p> <p>17 Mike and French are going to deliver what he's asking 09:34</p> <p>18 for, which I did, and then the supporters say, you 09:34</p> <p>19 know, I must be in the scam to cheat him, so asking 09:34</p> <p>20 him when should we attack Lianchao Han. 09:34</p> <p>21 Q. Were these supporters online supporters? 09:34</p> <p>22 A. I think they were through a private chat 09:34</p> <p style="text-align: right;">Page 19</p>	<p>1 and Clark Hill was representing him originally to do 09:36</p> <p>2 the political asylum case and then right after, you 09:36</p> <p>3 know, they file the application, the Chinese cyber 09:36</p> <p>4 attacked, basically hijacked the entire firm and 09:36</p> <p>5 forced the Clark Hill to drop representation of him. 09:36</p> <p>6 As a result, Miles' application was exposed 09:37</p> <p>7 because Chinese hackers got the information and 09:37</p> <p>8 posted online, which is damaging to his personal 09:37</p> <p>9 safety. 09:37</p> <p>10 Q. Now let me ask you when were your 09:37</p> <p>11 interactions with Mr. Podhaskie about that matter? 09:37</p> <p>12 A. I would say I don't know when he was 09:37</p> <p>13 hired. I think it's back and forth probably through 09:37</p> <p>14 maybe over half a year, maybe eight months. I don't 09:37</p> <p>15 remember specifically. 09:37</p> <p>16 Q. Half a year or eight months ago? 09:37</p> <p>17 A. Yes. Eight months ago, maybe a year 09:37</p> <p>18 ago. 09:37</p> <p>19 Q. And we're about to move on. I just want 09:37</p> <p>20 to make sure I understand this. 09:38</p> <p>21 A. Yeah. 09:38</p> <p>22 Q. How is it that you would have 09:38</p> <p style="text-align: right;">Page 21</p>

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1	information about the Clark Hill matter? What was	09:38	1	colleagues that agree with me, we try to persuade him	09:40
2	your involvement?	09:38	2	not to pursue it, and that was the earliest	09:40
3	A. I was helping Miles for his asylum case.	09:38	3	discussion. Of course, he won't listen to me and I	09:40
4	Q. So then you had interaction with the	09:38	4	tried a few more times this, and then I don't think	09:41
5	Clark Hill lawyers?	09:38	5	he was -- you know, there's no way he agreed with me.	09:41
6	A. Correct.	09:38	6	So that was that.	09:41
7	Q. How do you know that Chinese hackers did	09:38	7	Then, later, I think we discussed. He didn't	09:41
8	hack the Clark Hill law firm?	09:38	8	discuss specifically about the case at all. He kept	09:41
9	A. Clark Hill told me.	09:38	9	saying French and Mike are frauds, cheated him, which	09:41
10	Q. Do you believe them?	09:38	10	we always have a different view on that. I disagree	09:41
11	A. Of course.	09:38	11	with him on that. So we argued back and forth. So	09:41
12	Q. Okay. Let me ask about -- you mentioned	09:38	12	that pretty much was our main conversation about the	09:41
13	a couple of different conversations with Mr. Guo	09:39	13	case, whether they're cheating him or not.	09:41
14	about this case.	09:39	14	Q. Why do you disagree?	09:41
15	A. Yes.	09:39	15	A. Because I think everybody comes in with	09:41
16	Q. We talked about the longer conversation	09:39	16	a good intention at the beginning.	09:42
17	and then you said you met with him a few more times	09:39	17	Q. Who are the colleagues of Mr. Guo's that	09:42
18	in the office.	09:39	18	agreed with your position early on?	09:42
19	A. Yes.	09:39	19	MR. GAVENMAN: Objection to form.	09:42
20	Q. Now, whose office was that?	09:39	20	Go ahead.	09:42
21	A. Miles' office.	09:39	21	THE WITNESS: At the meeting was his --	09:42
22	Q. Where is that office?	09:39	22	Victor Cedar and William Yu. Williams, he's a	09:42
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1	A. I think at -- what is that? 62 -- 64	09:39	1	manager, I think.	09:42
2	Street of New York.	09:39	2	BY MR. GREIM:	09:42
3	Q. 64th Street on the upper east side?	09:39	3	Q. Is this William Je, J-E?	09:42
4	A. Yeah.	09:39	4	A. J-E? I think Yu. Right? No.	09:42
5	Q. Are those also the Golden Spring	09:39	5	I don't remember his last name, but he was --	09:42
6	offices?	09:39	6	he was -- I remember he was at the meeting. He also	09:43
7	A. That, I don't know.	09:39	7	agreed with me not to pursue this case, because we --	09:43
8	Q. When did those meetings occur, to the	09:39	8	yeah. I predict what's going to happen exactly like	09:43
9	best of your recollection?	09:39	9	what's happening right now.	09:43
10	A. That's hard to know. I think maybe two	09:39	10	MR. GRENDI: I'm sorry. What was the name of	09:43
11	months ago, there was one, or three months ago and	09:39	11	the first individual?	09:43
12	then early -- I have been there maybe three, four	09:40	12	THE WITNESS: Victor.	09:43
13	times.	09:40	13	MR. GRENDI: Sorry. I was asking the court	09:43
14	Q. Does Mr. Guo ask for your advice about	09:40	14	reporter. I apologize.	09:43
15	this case?	09:40	15	MR. GREIM: That's okay. I was going to ask	09:43
16	A. No.	09:40	16	anyway.	09:43
17	Q. What did you discuss with him about the	09:40	17	MR. GRENDI: Okay. Fair enough.	09:43
18	case? Let's start with the earliest meeting that you	09:40	18	BY MR. GREIM:	09:43
19	can remember.	09:40	19	Q. Victor, what was his last name?	09:43
20	A. I think at the beginning, I strongly	09:40	20	A. Cedar. Cedar. Correct?	09:43
21	advised when he mentioned he's going to sue French	09:40	21	Q. Was he at Foley, Hogue?	09:43
22	and Mike, I opposed the idea. I also got his	09:40	22	A. No. He is a solo practitioner.	09:43
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1	Q. Could you spell his last name?	09:43	1	Vision would likely counterclaim against him?	09:46
2	A. C-E-D-A-R. I could be wrong. I always	09:43	2	A. Yes. Not specifically counterclaim. I	09:46
3	just call his first name.	09:43	3	have to take that back. I think they will create	09:46
4	Q. What did you understand that William's	09:43	4	difficult situation that will jeopardize your	09:46
5	position was with Mr. Guo?	09:44	5	political asylum. It's not worth it.	09:47
6	A. I think he manages his financial assets.	09:44	6	Q. Did you ever speak with Yvette Wang, who	09:47
7	Q. Do you know if he is the director of a	09:44	7	is sitting here at the table, about the lawsuit?	09:47
8	company called ACA?	09:44	8	A. No.	09:47
9	A. That, I didn't know.	09:44	9	Q. Do you know what role she plays for Mr.	09:47
10	Q. Have you heard of that company, ACA or	09:44	10	Guo?	09:47
11	ACA Capital Group Limited?	09:44	11	MR. GRENDI: Object to the form.	09:47
12	A. I'm not sure, but one time, I think -- I	09:44	12	THE WITNESS: Roughly.	09:47
13	don't know which one. There's a trust fund or	09:44	13	BY MR. GREIM:	09:47
14	something that French tried to buy real estate for	09:44	14	Q. What is that?	09:47
15	Miles that needed a letter of credit. I think that	09:44	15	A. She's been his longtime assistant. He	09:47
16	company provided it. I don't know which company	09:44	16	managed -- she managed the office and she was	09:47
17	provided it.	09:44	17	originally excluded from this discussion, this	09:47
18	I don't remember that, but I think -- yeah.	09:44	18	project with Mike and French, and later, she was the	09:47
19	Maybe that.	09:45	19	one who signed the contract, finished the	09:48
20	Q. This William Yu --	09:45	20	negotiation, signed the contract with them, managed	09:48
21	A. Yeah.	09:45	21	the project until, in the end, Miles asked -- took	09:48
22	Q. -- where does he live?	09:45	22	her out, put me back in.	09:48
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1	A. I don't know. He seems to travel back	09:45	1	That's all I know. I don't know specifically	09:48
2	and forth, Hong Kong, London, and New York.	09:45	2	what she does, but that's just based on my	09:48
3	Q. Does he have a role with McQuary Capital	09:45	3	observation.	09:48
4	Group? Does that sound familiar?	09:45	4	Q. Well, have you heard of an entity called	09:48
5	A. I don't remember. Is that Australian?	09:45	5	Golden Spring New York or Golden Spring Hong Kong?	09:48
6	Q. It is.	09:45	6	A. I heard about it, yeah.	09:48
7	A. Then he used to be involved before Miles	09:45	7	MR. GRENDI: Object to the form.	09:48
8	hired him.	09:45	8	BY MR. GREIM:	09:48
9	Q. When the last time you saw William?	09:45	9	Q. Do you know whether Ms. Wang has a role	09:48
10	A. Well, that may be a year ago or -- I	09:45	10	with either of the Golden Spring entities?	09:48
11	don't remember. Maybe eight months ago.	09:46	11	MR. GRENDI: Objection to the form.	09:48
12	Q. I want to go back now. I just want to	09:46	12	THE WITNESS: I didn't.	09:48
13	make sure we cover this. Is there anything else that	09:46	13	BY MR. GREIM:	09:48
14	you discussed with Mr. Guo in these meetings in his	09:46	14	Q. Why was it that Ms. Wang -- well, let me	09:48
15	office --	09:46	15	back up.	09:48
16	A. Yeah.	09:46	16	Why do you say Ms. Wang was originally	09:48
17	Q. -- about the case that we haven't	09:46	17	excluded from the discussion?	09:49
18	covered yet?	09:46	18	A. I didn't know. I think, later -- I	09:49
19	A. There may be something, but I don't	09:46	19	forgot if he said in the meeting or he said to French	09:49
20	remember, but mainly, I remember the major picture,	09:46	20	and Mike later, but the reason was Miles didn't trust	09:49
21	big picture, thing is just this.	09:46	21	her and she has many relatives that is within the	09:49
22	Q. Did you tell Mr. Guo that Strategic	09:46	22	system.	09:49
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1	Q. What do you mean, "within the system"?	09:49	1	him with his various efforts to obtain political	09:52
2	A. With the communist, work for the Chinese	09:49	2	asylum from that point forward?	09:52
3	Government. I didn't know the source, but I just	09:49	3	A. Correct.	09:52
4	didn't remember if he said that in the meeting or	09:49	4	Q. What was your initial impression of Mr.	09:52
5	later, but that's my impression.	09:49	5	Guo?	09:52
6	Q. Well, let me back up for a second. When	09:49	6	A. I think he's a genuine warm person. He	09:52
7	did you first remember meeting her?	09:49	7	has a deep knowledge of how the communist system	09:53
8	A. Meeting Yvette?	09:50	8	works and he has a reason to expose the high-ranking	09:53
9	Q. Um-hum.	09:50	9	government officials that are corrupt and, also, he	09:53
10	A. I think maybe two years ago.	09:50	10	has many defects of the people from the communist	09:53
11	Q. Okay. So it would be late summer of	09:50	11	system.	09:53
12	2017?	09:50	12	Q. What do you mean by that?	09:53
13	A. It will be August or September. August,	09:50	13	A. Like --	09:53
14	most likely, yeah, August.	09:50	14	MR. GRENDI: Objection to form.	09:53
15	Q. How are you able to remember that time?	09:50	15	THE WITNESS: He probably won't tell you	09:53
16	A. That was political asylum. Miles tried	09:50	16	exactly what he thinks. Sometimes he exaggerates	09:53
17	to -- that's why we were introduced to him and he did	09:50	17	what he's done and stuff like that.	09:53
18	help him with his political asylum. Yeah.	09:50	18	BY MR. GREIM:	09:53
19	Q. What I should have asked you in the very	09:50	19	Q. So you met Ms. Wang, then, within about	09:53
20	beginning was when did you first meet Mr. Guo?	09:50	20	a month or so of having met Mr. Guo himself?	09:54
21	A. I think it's either July or August,	09:50	21	A. Correct.	09:54
22	early August or, you know, late July of 2017.	09:50	22	Q. Did your impression of Mr. Guo change	09:54
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1	Q. And who introduced you?	09:50	1	over time?	09:54
2	A. His name is Jonathan Ho. The Chinese	09:51	2	A. No.	09:54
3	name is Chen Jun.	09:51	3	Q. Do you consider yourself to be a	09:54
4	Q. Is that the last name, H-O?	09:51	4	personal friend of Mr. Guo?	09:54
5	A. Correct.	09:51	5	A. That's a very --	09:54
6	Q. Jonathan Ho. Who is Jonathan Ho?	09:51	6	Q. Sorry.	09:54
7	A. He is a longtime friend of mine. He	09:51	7	A. -- difficult question. I think I	09:54
8	also used to be an activist, pro-democracy activist.	09:51	8	maintain a personal relationship with him and, also,	09:54
9	He's a friend with the late Nobel Peace Prize winner	09:51	9	politically, I support his effort and I also have a	09:55
10	Liu Xiaobo.	09:51	10	lot of reservation about him.	09:55
11	Q. So why did Mr. Ho introduce you to Mr.	09:51	11	Q. What are those reservations?	09:55
12	Guo?	09:51	12	A. He just brings troubles to me. You	09:55
13	MR. GRENDI: Objection, form.	09:51	13	know, I live a very simple straightforward life.	09:55
14	MR. GAVENMAN: Objection to form.	09:51	14	This is my first deposition, first -- you know, this,	09:55
15	THE WITNESS: I think, at the time, they were	09:52	15	it's not fun.	09:55
16	talking about the options, what to do, whether to	09:52	16	My focus is the big picture, how to change	09:55
17	seek political asylum or other form of protection,	09:52	17	China, how to promote democracy. I don't want to	09:55
18	and he knows that, you know, I'm familiar with the	09:52	18	sign on to derail from that goal. This definitely is	09:55
19	American legal system. So he brought me to discuss	09:52	19	troublesome to me.	09:55
20	those options with Miles.	09:52	20	Q. Do you have any concern about whether	09:55
21	BY MR. GREIM:	09:52	21	Guo is fully committed to overturning the Chinese	09:56
22	Q. And is it fair to say that you assisted	09:52	22	communist system?	09:56
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1	A. Well, I think he's fully committed. At	09:56	1	MR. GRENDI: Object to the form.	09:58
2	the same time, he also has his relatives, his	09:56	2	THE WITNESS: I didn't know.	09:58
3	employees to be considered and his assets, although,	09:56	3	BY MR. GREIM:	09:58
4	all of it has been confiscated. So I understand his	09:56	4	Q. Do you know whether he is negotiating	09:58
5	position.	09:56	5	with Chinese officials even today?	09:59
6	Q. And would it surprise you if Mr. Guo,	09:56	6	A. I didn't know that either.	09:59
7	for example, vacillates in wanting regime change	09:56	7	Q. Let's shift gears for a moment here and	09:59
8	versus something less than that?	09:56	8	-- well, before we move on. After you met Guo, Mr.	09:59
9	MR. GRENDI: Object to the form.	09:57	9	Guo --	09:59
10	MR. GAVENMAN: Object to the form.	09:57	10	A. Yeah.	09:59
11	THE WITNESS: Can you rephrase that?	09:57	11	Q. -- did he introduce you to others	09:59
12	BY MR. GREIM:	09:57	12	besides Yvette Wang over the next month or two?	09:59
13	Q. Sure. Sure. Would it surprise you that	09:57	13	A. I met all his families, family members,	09:59
14	Mr. Guo tries to bargain with Chinese officials?	09:57	14	through him. I met with Tony Blair. I met -- who	09:59
15	MR. GRENDI: Object to the form.	09:57	15	else? There were several other people that's	09:59
16	MR. GAVENMAN: Objection to form.	09:57	16	significant maybe.	09:59
17	THE WITNESS: Frankly, I think it's possible,	09:57	17	Q. Did he introduce you to someone named	10:00
18	but it's unlikely, highly unlikely. It's too late	09:57	18	Hansheng Wang?	10:00
19	for that.	09:57	19	A. He never introduced me to Hansheng Wang.	10:00
20	BY MR. GREIM:	09:57	20	Hansheng Wang, I know used to be his staff. I got to	10:00
21	Q. What do you mean by it's too late for	09:57	21	know him in that capacity.	10:00
22	that?	09:57	22	Q. What does Hansheng Wang do for Mr. Guo?	10:00
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1	MR. GRENDI: Object to the form.	09:57	1	MR. GRENDI: Object to form.	10:00
2	MR. GAVENMAN: Objection to form.	09:57	2	MR. GAVENMAN: Object to the form.	10:00
3	THE WITNESS: He's already put himself in the	09:57	3	THE WITNESS: If I saw him, he do -- he does	10:00
4	position that he is the number one enemy of the	09:57	4	lots of different things, bodyguard, security. He	10:00
5	regime.	09:57	5	also cooks. What else he does? Run errands, book	10:00
6	BY MR. GREIM:	09:57	6	hotel rooms, you know.	10:00
7	Q. When did he cross that line?	09:57	7	BY MR. GREIM:	10:00
8	MR. GAVENMAN: Objection to form.	09:58	8	Q. Does he run any companies?	10:00
9	MR. GRENDI: Objection to the form.	09:58	9	A. I have no knowledge.	10:00
10	THE WITNESS: I don't know for sure. My	09:58	10	Q. Do you know if he's a principal of	10:00
11	speculation -- can I speculate?	09:58	11	Eastern Profit?	10:01
12	MR. GAVENMAN: You shouldn't speculate. Only	09:58	12	A. I didn't know that.	10:01
13	speak to things that you know.	09:58	13	Q. Does he actually live in Mr. Guo's	10:01
14	THE WITNESS: All right. But I think -- can	09:58	14	apartment?	10:01
15	I just say, more likely, after he turned the MSS	09:58	15	A. I didn't know that either.	10:01
16	Secretary of Discipline into FBI, they busted them at	09:58	16	MR. GAVENMAN: Objection to form.	10:01
17	La Guardia Airport and I think that's where he	09:58	17	MR. GRENDI: Object to the form.	10:01
18	crossed the line.	09:58	18	THE WITNESS: I saw him all the time there,	10:01
19	BY MR. GREIM:	09:58	19	but I didn't know he lived there.	10:01
20	Q. Do you know whether he attempted to	09:58	20	BY MR. GREIM:	10:01
21	negotiate with Chinese officials even after that	09:58	21	Q. Which Guo family members were you	10:01
22	point?	09:58	22	introduced to?	10:01
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<p>1 A. I met his son, Wu Chun. I met his 10:01</p> <p>2 daughter, Wo Mei, his wife, Yu Chen Su. 10:01</p> <p>3 Q. We'll get some of these names here on 10:01</p> <p>4 the break. 10:01</p> <p>5 A. Okay. 10:01</p> <p>6 MR. GRENDI: Eddie, I'm just going to jump in 10:01</p> <p>7 here. Are we going to get on topic here? We're 10:02</p> <p>8 talking about -- 10:02</p> <p>9 MR. GREIM: We are on topic. 10:02</p> <p>10 MR. GRENDI: Talking about Mr. Guo's family 10:02</p> <p>11 and who Mr. Lianchao has met, this has nothing to do 10:02</p> <p>12 with this dispute. 10:02</p> <p>13 MR. GREIM: Please don't disrupt the 10:02</p> <p>14 deposition. 10:02</p> <p>15 MR. GRENDI: I'm not disrupting the 10:02</p> <p>16 deposition. I want to move it along and have it on 10:02</p> <p>17 topic. You know, we're discussing irrelevant stuff 10:02</p> <p>18 right now, but please continue. 10:02</p> <p>19 BY MR. GREIM: 10:02</p> <p>20 Q. When was the first time that you met 10:02</p> <p>21 French Wallop? 10:02</p> <p>22 A. Let's see. I would say September -- 10:02</p> <p style="text-align: right;">Page 38</p>	<p>1 Guo? 10:04</p> <p>2 MR. GRENDI: Object to the form. 10:04</p> <p>3 THE WITNESS: I didn't approach them. 10:04</p> <p>4 BY MR. GREIM: 10:04</p> <p>5 Q. Did Ms. Wallop approach you? 10:04</p> <p>6 A. No. That's not the case. They were 10:04</p> <p>7 introduced through Bill Gertz. Bill Gertz called me 10:04</p> <p>8 and said can you set up meeting with Miles; I want to 10:04</p> <p>9 introduce Mike and French, Strategic Vision, to help 10:04</p> <p>10 Miles. So I set up meeting and we were introduced 10:04</p> <p>11 that way. 10:04</p> <p>12 Q. Okay. Did you already know Mr. Gertz? 10:04</p> <p>13 A. Yes. 10:04</p> <p>14 Q. How long have you known him? 10:05</p> <p>15 A. Thirty years. 10:05</p> <p>16 Q. Now, did Mr. Gertz, then, already seem 10:05</p> <p>17 to know or already seem to have a specific project in 10:05</p> <p>18 mind for Mr. Guo? 10:05</p> <p>19 MR. GRENDI: Objection. 10:05</p> <p>20 MR. GAVENMAN: Object to the form. 10:05</p> <p>21 THE WITNESS: Yes. 10:05</p> <p>22 BY MR. GREIM: 10:05</p> <p style="text-align: right;">Page 40</p>
<p>1 October or September of 2017. 10:02</p> <p>2 Q. Did you know her beforehand? 10:02</p> <p>3 A. I didn't know her. I know her -- I 10:02</p> <p>4 worked with her husband many years ago. So I had a 10:02</p> <p>5 very good relationship with his office. Naturally, I 10:03</p> <p>6 know of her. I didn't met her. 10:03</p> <p>7 Q. Was this Senator Malcolm Wallop? 10:03</p> <p>8 A. Correct. 10:03</p> <p>9 Q. What about Mr. Waller? 10:03</p> <p>10 A. That was the same time I met with 10:03</p> <p>11 French. 10:03</p> <p>12 Q. Did she you know of Mr. Waller before 10:03</p> <p>13 the fall of 2017? 10:03</p> <p>14 A. No. 10:03</p> <p>15 Q. Let's talk a little bit about the 10:03</p> <p>16 research project that's at issue here. How is it 10:03</p> <p>17 that -- well, let me ask you this: Did there come a 10:03</p> <p>18 time that you approached French Wallop about possible 10:03</p> <p>19 work for Mr. Guo? 10:04</p> <p>20 A. Say that again. 10:04</p> <p>21 Q. Did there come a time when you 10:04</p> <p>22 approached Ms. Wallop about possible work for Mr. 10:04</p> <p style="text-align: right;">Page 39</p>	<p>1 Q. What was that? 10:05</p> <p>2 A. I think that was the original proposal 10:05</p> <p>3 French and Mike brought with them or maybe they first 10:05</p> <p>4 gave it to me and I shared it with Miles to handle 10:05</p> <p>5 his communication, pretty much. 10:05</p> <p>6 Q. So when Mr. Gertz came to you -- 10:05</p> <p>7 A. Yes. 10:05</p> <p>8 Q. -- and asked you to set up this 10:05</p> <p>9 meeting -- 10:05</p> <p>10 A. Yes. 10:05</p> <p>11 Q. -- did you understand that he had 10:05</p> <p>12 already spoken to Ms. Wallop and Mr. Waller? 10:05</p> <p>13 A. Absolutely. 10:06</p> <p>14 MR. GRENDI: Objection. 10:06</p> <p>15 BY MR. GREIM: 10:06</p> <p>16 Q. At that time, let's say when -- let me 10:06</p> <p>17 strike that. 10:06</p> <p>18 When Mr. Gertz first contacted you about 10:06</p> <p>19 this -- 10:06</p> <p>20 A. Yeah. 10:06</p> <p>21 Q. -- were you already aware that Mr. Guo 10:06</p> <p>22 was looking for some type of research? 10:06</p> <p style="text-align: right;">Page 41</p>

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<p>1 A. No. 10:06</p> <p>2 MR. GAVENMAN: Objection to form. 10:06</p> <p>3 MR. GRENDI: Objection to the form. 10:06</p> <p>4 THE WITNESS: Miles didn't even know what he 10:06</p> <p>5 was looking for. He had -- this is not his idea 10:06</p> <p>6 whatsoever. 10:06</p> <p>7 BY MR. GREIM: 10:06</p> <p>8 Q. Why did you agree to set up a meeting 10:06</p> <p>9 between Wallop and Waller and Guo? 10:07</p> <p>10 A. I think French and Mike had very good 10:07</p> <p>11 experience in handling strategic communication. They 10:07</p> <p>12 have a good reputation in Washington, D.C., also 10:07</p> <p>13 under the strong recommendation by Bill Gertz. I 10:07</p> <p>14 also know Senator Wallop. So I, of course, I 10:07</p> <p>15 naturally think they could do the job. 10:07</p> <p>16 Q. Before this project came along -- 10:07</p> <p>17 A. Yeah. 10:07</p> <p>18 Q. -- had you ever been involved with any 10:07</p> <p>19 sort of research project into individuals? 10:07</p> <p>20 MR. GAVENMAN: Objection to form. 10:08</p> <p>21 THE WITNESS: No. 10:08</p> <p>22 BY MR. GREIM: 10:08</p> <p style="text-align: right;">Page 42</p>	<p>1 but there was a huge leak of data that exposed lots 10:09</p> <p>2 of Chinese Government officials' offshore companies. 10:09</p> <p>3 I looked into that. 10:09</p> <p>4 We did a lot of research through different 10:09</p> <p>5 means and we submitted it the U.S. Government about 10:10</p> <p>6 those individuals, that corruption with a select few 10:10</p> <p>7 that specifically -- you know, based on the 10:10</p> <p>8 corruption and required the U.S. Government sanction 10:10</p> <p>9 them under the FCP Act. 10:10</p> <p>10 Q. And -- okay. And was that with the 10:10</p> <p>11 Hudson Institute? 10:10</p> <p>12 A. No. With the Citizen Power initiative 10:10</p> <p>13 and with the Hudson initiative. 10:10</p> <p>14 Q. I see. So in the fall of 2017 -- and 10:10</p> <p>15 then we'll take a break here. 10:10</p> <p>16 A. Yeah. 10:10</p> <p>17 Q. In the fall of 2017, had you discussed 10:10</p> <p>18 with Mr. Guo that he might be able to contribute to 10:10</p> <p>19 something like that, to that kind of an effort? 10:11</p> <p>20 A. Yes, I did. 10:11</p> <p>21 Q. And was that before Mr. Gertz contacted 10:11</p> <p>22 you about Ms. Wallop and Mr. Waller? 10:11</p> <p style="text-align: right;">Page 44</p>
<p>1 Q. Had you ever been involved with any sort 10:08</p> <p>2 of research project into the Chinese Communist Party? 10:08</p> <p>3 MR. GAVENMAN: Objection to form. 10:08</p> <p>4 THE WITNESS: Just personally on my -- what 10:08</p> <p>5 type of research? Can you rephrase that? 10:08</p> <p>6 BY MR. GREIM: 10:08</p> <p>7 Q. Sure. Maybe a project where there would 10:08</p> <p>8 be an effort to find nonpublic information about 10:08</p> <p>9 Chinese Communist Party members. 10:08</p> <p>10 MR. GAVENMAN: Objection to form. 10:08</p> <p>11 THE WITNESS: Not in -- we have done lots of 10:08</p> <p>12 -- I've done lots of research on the Communist Party 10:08</p> <p>13 members, particularly on the corruption side. I 10:08</p> <p>14 worked with Hudson Institute. This Kleptocracy 10:08</p> <p>15 Center, I helped them with the relationship, the 10:09</p> <p>16 mapping of Chinese high-ranking government officials, 10:09</p> <p>17 their corruption, you know, potential corruption. 10:09</p> <p>18 I also worked on several other projects, 10:09</p> <p>19 tried to pinpoint the Chinese high-ranking government 10:09</p> <p>20 officials, the family corruption, and based on some 10:09</p> <p>21 of the -- based on the international consortium, you 10:09</p> <p>22 know, there was a leak from Wikipedia for the source, 10:09</p> <p style="text-align: right;">Page 43</p>	<p>1 A. Yes. 10:11</p> <p>2 Q. So do you know whether Mr. Guo was at 10:11</p> <p>3 least considering some sort of research project into 10:11</p> <p>4 the Chinese Communist Party members? 10:11</p> <p>5 A. It's not -- 10:11</p> <p>6 MR. GAVENMAN: Objection to form. 10:11</p> <p>7 MR. GRENDI: Objection to the form. 10:11</p> <p>8 THE WITNESS: Yeah. It's not specific. This 10:11</p> <p>9 idea, my point at the time when I communicated with 10:11</p> <p>10 Miles, I said in order to have this whistle-blowing, 10:11</p> <p>11 this disruptive momentum you made to continue -- they 10:11</p> <p>12 call it the whistle-blowing revolution to continue -- 10:11</p> <p>13 I told him you need very solid evidence to 10:11</p> <p>14 sustainable expose Chinese communist high-ranking 10:11</p> <p>15 government officials. 10:12</p> <p>16 So that was the principle. We never get into 10:12</p> <p>17 detail how to do it until Mike and French's proposal 10:12</p> <p>18 come over. I was the one -- originally, this project 10:12</p> <p>19 basically is a communication, handling the 10:12</p> <p>20 communication, P.R., not into the investigation. I 10:12</p> <p>21 was the one who approached -- I explored this 10:12</p> <p>22 possibility with French and Mike first and they said 10:12</p> <p style="text-align: right;">Page 45</p>

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1	they can do it and then I convinced Miles to move to	10:12	1	THE WITNESS: You mean through social media?	10:27
2	this direction. It's not from Miles. It's from me.	10:12	2	BY MR. GREIM:	10:27
3	MR. GREIM: Okay. I don't know that we've	10:12	3	Q. Through social media.	10:27
4	been going for quite an hour yet, but let's go ahead	10:12	4	A. Yes.	10:27
5	and take our first break, if that's okay.	10:13	5	Q. So you reviewed some of those items	10:27
6	THE WITNESS: All right.	10:13	6	yourself?	10:27
7	MR. GREIM: We'll take a -- let's go ahead	10:13	7	A. Usually, you know, his media videos are	10:27
8	and try to just make it five, if we can.	10:13	8	too long. I usually don't watch it unless there's a	10:28
9	VIDEOGRAPHER: Going off the record. The	10:13	9	specific issue I found interesting.	10:28
10	time is 10:15 a.m.	10:13	10	Q. Now, did you talk with Mr. Guo about his	10:28
11	[Recess.]	10:26	11	own background?	10:28
12	VIDEOGRAPHER: We are back on the record.	10:26	12	And this is -- we're going to limit it to, you	10:28
13	The time is now 10:28 a.m.	10:26	13	know, all your discussions with him up until the time	10:28
14	BY MR. GREIM:	10:26	14	you introduced Strategic Vision to Mr. Guo.	10:28
15	Q. Welcome back, Mr. Han.	10:26	15	MR. GREIM: Object to the form.	10:28
16	A. Yes.	10:26	16	MR. GAVENMAN: Object to form.	10:28
17	Q. Let's go again to the same timeframe	10:26	17	THE WITNESS: There are some discussions,	10:28
18	we've been talking about, sort of late summer, early	10:26	18	because I think that's also privileged because of	10:28
19	fall of 2017. At that time, is it fair to say that	10:26	19	related to his political asylum. I think it's better	10:28
20	your interactions with Mr. Guo were, number one,	10:26	20	not for me to talk about it.	10:28
21	about his asylum application --	10:26	21	BY MR. GREIM:	10:28
22	A. Correct.	10:26	22	Q. Did he retain you as counsel on the	10:28
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1	Q. -- and, number two, some general	10:26	1	political asylum matter?	10:29
2	discussions about what it would take for him to sort	10:26	2	A. Not as counsel, but as facilitator, you	10:29
3	of be a whistleblower about the Chinese Communist	10:26	3	know, sort of a legal assistant. We -- yeah.	10:29
4	Party?	10:26	4	Q. Okay. So I want to make sure I'm clear.	10:29
5	MR. GAVENMAN: Objection.	10:26	5	Do you believe you were acting as his attorney?	10:29
6	MR. GREIM: Object to the form.	10:26	6	A. I wasn't --	10:29
7	THE WITNESS: He was already a whistleblower	10:26	7	MR. GREIM: Object to form.	10:29
8	at the time. My suggestion was to sustain that	10:27	8	MR. GAVENMAN: Object to the form.	10:29
9	whistleblower.	10:27	9	[Interruption.]	10:29
10	BY MR. GREIM:	10:27	10	BY MR. GREIM:	10:29
11	Q. Now, by this point, had you done any	10:27	11	Q. Were you able to finish your answer?	10:29
12	research of your own into Mr. Guo's background?	10:27	12	A. Yes.	10:29
13	A. A little bit.	10:27	13	Q. Were you being paid by Guo at this time?	10:29
14	Q. Okay. What did you do to look into his	10:27	14	A. No.	10:29
15	background?	10:27	15	MR. GREIM: Object to the form.	10:29
16	A. Just online information.	10:27	16	BY MR. GREIM:	10:29
17	Q. So you read some of the articles that	10:27	17	Q. By the way, have you ever been paid by	10:29
18	had been written about him?	10:27	18	Mr. Guo or by one of the entities he controls?	10:29
19	A. Correct.	10:27	19	A. No.	10:30
20	Q. And by this point, had he begun posting	10:27	20	MR. GREIM: Objection.	10:30
21	things online himself?	10:27	21	MR. GAVENMAN: Objection to form.	10:30
22	MR. GREIM: Object to the form.	10:27	22	BY MR. GREIM:	10:30
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1	Q. Have you been paid by the Rule of Law	10:30	1	MR. GAVENMAN: Objection to form.	10:32
2	Foundation?	10:30	2	MR. GRENDI: Objection.	10:32
3	A. No.	10:30	3	THE WITNESS: A lot of that discussion, you	10:32
4	Q. Okay. Then here's what I'll do. I'm	10:30	4	know, this is all from the meeting.	10:32
5	not -- I don't believe a privilege will apply to	10:30	5	MR. GAVENMAN: So I'm going to instruct you	10:32
6	shield his disclosures to you about his past from	10:30	6	not to answer, attorney-client privilege.	10:32
7	discovery, but what I'm going to do is just simply	10:30	7	THE WITNESS: Yeah.	10:32
8	ask you about your knowledge. Okay?	10:30	8	BY MR. GREIM:	10:32
9	And what we'll try to do is not put it -- we	10:30	9	Q. Did Mr. Guo make representations to	10:32
10	will try not to ask about conversations that you had	10:30	10	French Wallop or Mike Waller about his past?	10:32
11	with him while his asylum counsel were present.	10:30	11	MR. GAVENMAN: Objection to form, foundation.	10:33
12	Okay?	10:30	12	THE WITNESS: During the meeting with them?	10:33
13	A. [Gestures.]	10:30	13	BY MR. GREIM:	10:33
14	Q. Okay.	10:30	14	Q. Yes.	10:33
15	MR. GAVENMAN: Let me caution you. To the	10:30	15	A. I didn't remember exactly what he said	10:33
16	extent you learned anything in the course of those	10:31	16	to them. I think that maybe there is some	10:33
17	discussions, you shouldn't disclose that either.	10:31	17	discussion.	10:33
18	THE WITNESS: Correct.	10:31	18	Q. Did Mr. Guo participate in the Tieneman	10:33
19	BY MR. GREIM:	10:31	19	Square protest?	10:33
20	Q. So did you understand that Mr. Guo	10:31	20	A. During the time of that meeting?	10:33
21	became a dissident during the Tieneman Square	10:31	21	MR. GAVENMAN: Asked and answered.	10:33
22	demonstrations and massacre?	10:31	22	MR. GRENDI: Objection.	10:33
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1	A. Say that again.	10:31	1	MR. GAVENMAN: We've established that there	10:33
2	Q. Well, let me ask you a different	10:31	2	is privilege attached to that answer. So I instruct	10:33
3	question, because that's -- did you understand that	10:31	3	you not to answer as well.	10:33
4	Mr. Guo participated in the Tieneman Square	10:31	4	BY MR. GREIM:	10:33
5	demonstrations and massacre?	10:31	5	Q. What do you remember about what Mr. Guo	10:33
6	MR. GRENDI: Object to the form.	10:31	6	said about himself to Ms. Wallop and Mr. Waller?	10:34
7	MR. GAVENMAN: Objection.	10:31	7	A. I don't remember much.	10:34
8	THE WITNESS: Understand?	10:31	8	Q. What do you remember though?	10:34
9	BY MR. GREIM:	10:31	9	A. I remember specifically what was	10:34
10	Q. Yes. Did you believe?	10:31	10	discussed about the proposal, you know, what to do	10:34
11	MR. GRENDI: Objection.	10:31	11	about what information is required and the back and	10:34
12	MR. GAVENMAN: Objection. This is pretty far	10:31	12	forth.	10:34
13	afield from what Mr. Han is here to testify about.	10:31	13	Q. What did Mr. Guo say he wanted to do	10:34
14	I'm not sure how this is a good use of your time, but	10:31	14	with the research?	10:34
15	you can keep going.	10:32	15	A. He wanted --	10:34
16	THE WITNESS: That discussion is with his	10:32	16	MR. GAVENMAN: Objection.	10:34
17	counsel.	10:32	17	MR. GRENDI: Objection to form.	10:34
18	MR. GAVENMAN: So objection, privilege. I	10:32	18	THE WITNESS: He wanted to expose the	10:34
19	instruct you not to answer.	10:32	19	corruption of the highest-ranking members of the	10:34
20	THE WITNESS: Right.	10:32	20	Communist Party.	10:34
21	BY MR. GREIM:	10:32	21	BY MR. GREIM:	10:34
22	Q. Do you know why Mr. Guo left China?	10:32	22	Q. Did he say how he wanted to do that?	10:34
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1	A. That was during the discussion. How	10:34	1	A. Let's make it clear.	10:38
2	he's going to do it, I don't think he has an idea.	10:35	2	Q. That's right. So Mr. Gertz is the one	10:38
3	We proposed -- I actually talked to French and Mike,	10:35	3	who introduced Wallop and Waller to you and then you	10:38
4	seeing whether we can use some unconventional way to	10:35	4	met with Wallop and Waller after that?	10:38
5	obtain this information.	10:35	5	A. He is introducing them to Miles. I am	10:39
6	Q. Do you know, roughly, when Mr. Guo began	10:35	6	the facilitator to set it up.	10:39
7	speaking out against Communist Part members?	10:36	7	Q. Okay. I'm going to direct you to --	10:39
8	MR. GAVENMAN: Objection the form.	10:36	8	and, first of all, this article is based on Mr.	10:39
9	THE WITNESS: I would say in the America, at	10:36	9	Gertz's interview of Mr. Guo. I want to direct you	10:39
10	least, I know, maybe April of 2017. This is during	10:36	10	first to -- before we do this, let me ask you are you	10:39
11	his interview with Mirror Tv.	10:36	11	aware of an alleged Chinese origin cyber attack on	10:39
12	BY MR. GREIM:	10:36	12	the Hudson Institute?	10:39
13	Q. What the Mirrow Tv?	10:36	13	A. Yes.	10:39
14	A. It's a Chinese language TV, maybe the	10:36	14	Q. And you recall that Guo has frequently	10:39
15	largest Chinese language media group here, based in	10:36	15	cited that as evidence that the Chinese Government is	10:39
16	New York.	10:36	16	out to get him, basically?	10:39
17	Q. Have you seen that interview?	10:36	17	MR. GRENDI: Objection to form.	10:39
18	A. I didn't.	10:36	18	MR. GAVENMAN: Objection to the form.	10:39
19	Q. Have you seen --	10:36	19	THE WITNESS: I didn't know.	10:40
20	A. Maybe just very part.	10:37	20	BY MR. GREIM:	10:40
21	Q. I'm sorry? You may have just seen part	10:37	21	Q. Okay. Were you helping to plan the	10:40
22	of it?	10:37	22	Hudson event?	10:40
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1	A. Maybe a small part of it, not directly	10:37	1	A. Correct.	10:40
2	from Tv. They always, you know, like through You	10:37	2	MR. GRENDI: Objection.	10:40
3	Tube, somebody else posted it.	10:37	3	BY MR. GREIM:	10:40
4	Q. Right. Have you seen other interviews	10:37	4	Q. Are you aware that the Hudson event --	10:40
5	of Mr. Guo on You Tube or on TV?	10:37	5	well, who was in charge of the HUD event within the	10:40
6	A. I might, but very limited.	10:37	6	institute?	10:40
7	Q. Do you remember what articles you	10:37	7	A. It was Charles Davidson at the	10:40
8	reviewed about Mr. Guo's past?	10:37	8	beginning.	10:40
9	A. I didn't.	10:37	9	Q. What was the last name?	10:40
10	[Han Exhibit No. 2 was	10:38	10	A. Davidson, and then I took it over,	10:40
11	marked for identification.]	10:38	11	because he said he's not able to do it. He's afraid	10:40
12	BY MR. GREIM:	10:38	12	that, you know, his son-in-law's -- his son's fiance,	10:40
13	Q. I'm going to show you what we are	10:38	13	who is Chinese, will be retaliated against. So he	10:40
14	marking as Exhibit 2. You'll see this is an article	10:38	14	asked me to take over.	10:40
15	by Bill Gertz, who we mentioned a few times earlier	10:38	15	Q. Who is the person at Hudson who agreed	10:40
16	today. It appeared October 9, 2017.	10:38	16	to cancel the event?	10:40
17	Is this around the time, by the way, that you	10:38	17	A. I think the --	10:40
18	were introducing Ms. Wallop and Mr. Waller to Mr.	10:38	18	MR. GRENDI: Objection to the form.	10:40
19	Guo?	10:38	19	MR. GAVENMAN: Objection.	10:40
20	A. I think this is before the time that he	10:38	20	THE WITNESS: I think the head of -- the CEO,	10:40
21	was introducing.	10:38	21	Ken Winston. I don't know exactly who agreed, but it	10:41
22	Q. That's right.	10:38	22	was Ken called me to tell me it's cancelled.	10:41
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1	THE WITNESS: In the private meeting, he told	10:58	1	[Video presentation.]	11:02
2	me that he's -- he expressed a very completely	10:58	2	MR. GREIM: All right. That's the end of the	11:05
3	different view about Xi, about Communist Party.	10:58	3	clip.	11:05
4	BY MR. GREIM:	10:58	4	MR. GRENDI: I'm sorry. Objection. I just	11:05
5	Q. What do you mean, a completely different	10:58	5	don't understand. Are there two speakers on that or	11:05
6	view?	10:58	6	just one?	11:05
7	A. He's opposing Xi's dictatorship -- put	10:58	7	MR. GREIM: This was -- let me read some more	11:05
8	it that way -- strongly.	10:59	8	background on this. This was pulled from You Tube,	11:05
9	Q. Sir, I'm going to play for you a video	10:59	9	https://youtu.be/whKwLpKbUQ published April 29,	11:05
10	of Mr. Guo speaking. I'm going to see if this is	10:59	10	2017.	11:05
11	something you have heard before and I'm going to see	10:59	11	Let me ask the witness, first of all --	11:05
12	if you at least recognize his voice.	11:00	12	MR. GRENDI: Hold on.	11:05
13	A. Yeah.	11:00	13	BY MR. GREIM:	11:05
14	Q. This will be in Chinese. So the court	11:00	14	Q. Do you recognize the voice on the	11:05
15	reporter will not be able to transcribe it.	11:00	15	recording?	11:05
16	A. Okay.	11:00	16	MR. GRENDI: Objection. Are there two	11:05
17	Q. However, I'm going to distribute a	11:00	17	voices? I don't understand. It says Speaker 1.	11:05
18	translation that we have already served on our	11:00	18	MR. GREIM: Please don't interrupt the	11:05
19	opposing counsel and I'll make it available to you as	11:00	19	questioning. There's only one thing that says	11:06
20	well. We are going to mark this as Han 3.	11:00	20	Speaker 1. There are not two voices.	11:06
21	[Han Exhibit No. 3 was	11:00	21	MR. GRENDI: I don't know.	11:06
22	marked for identification.]	11:01	22	MR GREIM: Please don't interrupt. Please	11:06
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1	MR. GREIM: I'm going to arrange these	11:01	1	don't interrupt the questioning.	11:06
2	speakers so that, hopefully, everybody can hear this	11:01	2	MR. GRENDI: Objection to the entire line of	11:06
3	really well.	11:01	3	questioning. You may continue.	11:06
4	MR. GRENDI: Is this a certified translation?	11:01	4	MR. GAVENMAN: I object as well.	11:06
5	MR. GREIM: Yeah. The affidavit that you	11:01	5	BY MR. GREIM:	11:06
6	received goes with all of these. This has been	11:01	6	Q. All right. Do you recognize the voice	11:06
7	produced to you.	11:01	7	on the recording, sir?	11:06
8	MR. GRENDI: I got a lot of stuff in the last	11:01	8	A. Yes.	11:06
9	few days.	11:01	9	Q. Whose voice is that?	11:06
10	All right. On your representation this is	11:01	10	A. Miles.	11:06
11	certified translation, I would object to the extent	11:01	11	Q. I'm sorry?	11:06
12	it's not certified.	11:01	12	A. Miles.	11:06
13	MR. GREIM: Okay.	11:01	13	Q. Miles?	11:06
14	MR. GRENDI: Thank you.	11:01	14	A. Yes.	11:06
15	MR. GREIM: All right. And here we go. This	11:01	15	Q. Have you heard any part of this before?	11:06
16	is about a three-minute-and-one-second clip.	11:01	16	A. No. This is actually my first time.	11:06
17	Actually, the You Tube version of this, sir, has -- I	11:01	17	Q. And did you hear in the opening that Mr.	11:06
18	know someone from You Tube tried to translate it, and	11:01	18	Guo said I have absolute faith in General Secretary	11:06
19	just so you can see what I'm playing, I'm going to	11:02	19	Xi?	11:06
20	turn my computer screen around so that you can see	11:02	20	MR. GRENDI: Objection.	11:06
21	it. I know it's some distance from you, but I'm	11:02	21	THE WITNESS: Yes.	11:06
22	going to ahead and play.	11:02	22	BY MR. GREIM:	11:06
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1	Q. Did you also hear him criticize certain	11:06	1	MR. GAVENMAN: Objection to form.	11:07
2	dissidents in the United States?	11:06	2	BY MR. GREIM:	11:07
3	A. Yes.	11:06	3	Q. By the way, were you following along	11:07
4	MR. GAVENMAN: Objection to form.	11:06	4	with the translation while you were listening?	11:07
5	MR. GRENDI: Objection.	11:06	5	A. Yeah.	11:07
6	BY MR. GREIM:	11:06	6	Q. Did you find the translation to be	11:07
7	Q. Have you heard him express similar views	11:06	7	generally accurate?	11:07
8	to you?	11:06	8	MR. GRENDI: Objection.	11:07
9	MR. GAVENMAN: Objection to form.	11:06	9	THE WITNESS: No. I didn't look at English.	11:07
10	THE WITNESS: About Xi?	11:06	10	I just looked at the Chinese.	11:08
11	BY MR. GREIM:	11:06	11	BY MR. GREIM:	11:08
12	Q. Let's start with Xi, about Xi.	11:06	12	Q. I see. Did you find the Chinese	11:08
13	MR. GAVENMAN: Objection to form.	11:07	13	transcription to be generally accurate?	11:08
14	THE WITNESS: Never.	11:07	14	MR. GRENDI: Objection to form. He didn't	11:08
15	BY MR. GREIM:	11:07	15	read the English.	11:08
16	Q. Have you heard him express similar views	11:07	16	THE WITNESS: The Chinese, yes.	11:08
17	regarding dissidents?	11:07	17	BY MR. GREIM:	11:08
18	MR. GAVENMAN: Objection to form.	11:07	18	Q. Does it surprise you that Guo made a	11:08
19	MR. GRENDI: Objection.	11:07	19	statement such as this?	11:08
20	THE WITNESS: It depends on what dissidents	11:07	20	MR. GAVENMAN: Objection to form.	11:08
21	you are talking about.	11:07	21	MR. GRENDI: Objection to the form.	11:08
22	BY MR. GREIM:	11:07	22	THE WITNESS: No, not at all.	11:08
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1	Q. So about some dissidents, he has	11:07	1	BY MR. GREIM:	11:08
2	expressed a similar view?	11:07	2	Q. Why not?	11:08
3	MR. GAVENMAN: Objection to form.	11:07	3	A. Chinese politics --	11:08
4	MR. GRENDI: Objection to form.	11:07	4	MR. GAVENMAN: Objection.	11:08
5	THE WITNESS: Yes.	11:07	5	MR. GRENDI: Objection.	11:08
6	BY MR. GREIM:	11:07	6	THE WITNESS: -- are complicated. What he	11:08
7	Q. Okay. What about -- I assume that he	11:07	7	said on a public platform is not what he really	11:08
8	has expressed similar views about Xi Nuo.	11:07	8	intended to say. That's just my understanding and,	11:08
9	A. Yes.	11:07	9	also, activists in this community, not all of them	11:08
10	MR. GAVENMAN: Objection to form.	11:07	10	are real activists. Some are fake. Some are	11:08
11	MR. GRENDI: Objection to form.	11:07	11	actually working for the Chinese regime, including	11:08
12	BY MR. GREIM:	11:07	12	this guy, Xi Nuo.	11:09
13	Q. Has he expressed to you that one of his	11:07	13	BY MR. GREIM:	11:09
14	goals is to punish certain dissidents in the United	11:07	14	Q. So you're aware the Xi Nuo works for the	11:09
15	States?	11:07	15	Chinese regime?	11:09
16	A. He didn't --	11:07	16	A. Yes.	11:09
17	MR. GRENDI: Objection to form.	11:07	17	MR. GAVENMAN: Objection to form.	11:09
18	THE WITNESS: -- put it that way.	11:07	18	BY MR. GREIM:	11:09
19	BY MR. GREIM:	11:07	19	Q. How do you know that?	11:09
20	Q. Did you hear him say in this tape that	11:07	20	A. I have informant that provides that some	11:09
21	they deserve to be punished?	11:07	21	people work with Xi Nuo.	11:09
22	A. Yes.	11:07	22	Q. Let's -- you know what? Let's stop	11:09
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21 (Pages 78 to 81)

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1	there, because everybody -- most people at this	11:09	1	suing others. It's the other side suing him as well.	11:11
2	table, I think, have the same goals and there are --	11:09	2	BY MR. GREIM:	11:11
3	we probably do not need to get into the answer to	11:09	3	Q. Is it your testimony that every	11:11
4	that question.	11:09	4	dissident that Mr. Guo is in litigation with -- well,	11:11
5	Okay. There's just no need to do that here.	11:09	5	let me back up. That's a closed question.	11:11
6	A. Okay.	11:09	6	Let me just ask you this.	11:11
7	MR. GRENDI: Wait. Stop.	11:09	7	A. Yeah.	11:12
8	MR. PODHASKIE: It's one of his best friends	11:09	8	Q. Are you aware of whether Mr. Guo is in	11:12
9	on Twitter. Let him go on and explain.	11:09	9	litigation with any dissident who is not working with	11:12
10	MR. GRENDI: Hold on, Dan. You don't have an	11:09	10	the Chinese regime?	11:12
11	appearance here.	11:09	11	MR. GAVENMAN: Objection to form.	11:12
12	MR. GREIM: I would ask Mr. Podhaskie to	11:09	12	MR. GRENDI: Objection to form.	11:12
13	please stop interfering with the deposition.	11:09	13	THE WITNESS: I'm not sure. I think there	11:12
14	MR. GAVENMAN: As Mr. Han's counsel, he has	11:09	14	are lots of them working with the regime, because	11:12
15	to be allowed to answer the question completely. You	11:09	15	they, themselves, cannot afford this large amount	11:12
16	asked a question. He can answer.	11:10	16	legal bill. Nobody wants to pay that.	11:12
17	MR. GREIM: Fair enough. Fair enough. I	11:10	17	BY MR. GREIM:	11:12
18	detected some hesitance and I wanted to signal to the	11:10	18	Q. As you said earlier, could some of these	11:12
19	witness that we didn't need to hear it, but if you	11:10	19	dissidents be trying in their own way to use the	11:12
20	would like to finish the answer, go ahead.	11:10	20	regime?	11:12
21	MR. GAVENMAN: Please complete you answer,	11:10	21	MR. GAVENMAN: Objection, form.	11:12
22	Mr. Han.	11:10	22	MR. GRENDI: Objection to form.	11:12
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1	THE WITNESS: Ys. We have evidence that Xi	11:10	1	MR. GAVENMAN: Foundation.	11:12
2	Nuo is working with the Chinese regime. I have	11:10	2	THE WITNESS: Yes.	11:12
3	submitted that evidence to the FBI.	11:10	3	BY MR. GREIM:	11:12
4	BY MR. GREIM:	11:10	4	Q. Earlier, we talked a little bit about	11:12
5	Q. By the way, was there anything that you	11:10	5	the visit by Chinese authorities to Mr. Guo in the	11:13
6	heard in the clip that was inaudible to you or that	11:10	6	United States.	11:13
7	you did not understand?	11:10	7	A. Yeah.	11:13
8	A. No.	11:10	8	Q. Do you recall when that occurred?	11:13
9	Q. Are you aware that Mr. Guo has filed	11:10	9	A. I didn't.	11:13
10	several lawsuits against dissidents in the United	11:11	10	Q. Does May 2017 sound correct to you?	11:13
11	States?	11:11	11	A. Yes.	11:13
12	MR. GAVENMAN: Objection to form.	11:11	12	MR. GAVENMAN: Objection to form.	11:13
13	MR. GRENDI: Objection to form.	11:11	13	MR. GRENDI: Objection to form.	11:13
14	THE WITNESS: Yes.	11:11	14	BY MR. GREIM:	11:13
15	BY MR. GREIM:	11:11	15	Q. Is that one of the -- did part of your	11:13
16	Q. And have you advised Mr. Guo on those	11:11	16	research into Mr. Guo involve reading accounts of the	11:13
17	lawsuits?	11:11	17	visit by Chinese officials to Guo's apartment?	11:13
18	MR. GAVENMAN: Objection to form.	11:11	18	MR. GRENDI: Objection.	11:14
19	THE WITNESS: No, but I did ask him not to	11:11	19	THE WITNESS: Yes.	11:14
20	get involved, because my reason is this is Chinese	11:11	20	BY MR. GREIM:	11:14
21	Communist regime strategy, to get him involved in the	11:11	21	Q. And did Guo also discuss the visit with	11:14
22	lawsuit, consume his resources. It's not just him	11:11	22	you?	11:14
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22 (Pages 82 to 85)

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1	A. That was with the counsel.	11:14	1	MR. GREIM: Sure, but whether Mr. Guo has	11:15
2	Q. With counsel?	11:14	2	recordings of these meetings is not a privileged	11:15
3	A. Yes.	11:14	3	matter. Is it a fact. It either happened or it did	11:16
4	Q. Okay. By the way, just to -- I want to	11:14	4	not.	11:16
5	be clear about this. Who were the names of the Clark	11:14	5	THE WITNESS: I didn't know that.	11:16
6	Hill attorneys who were involved in that matter? Do	11:14	6	MR. GAVENMAN: Please don't reveal anything	11:16
7	you remember?	11:14	7	that you learned in a privileged conversation.	11:16
8	MR. GREIM: Objection.	11:14	8	THE WITNESS: Yeah. I didn't know whatever	11:16
9	THE WITNESS: Thomas Ragland.	11:14	9	public information, but all I know is what I learned	11:16
10	BY MR. GREIM:	11:14	10	from the counsel regarding the meetings.	11:16
11	Q. Okay.	11:14	11	[Han Exhibit No. 4 was	11:16
12	A. It's public information, by the way.	11:14	12	marked for identification.]	11:16
13	Q. Jay Johnson, was he one of them?	11:14	13	BY MR. GREIM:	11:16
14	A. Never heard of him.	11:14	14	Q. I'm going to show you what we're marking	11:16
15	Q. Are you aware that Mr. Guo recorded all	11:14	15	as Exhibit 4, and you'll see this is a "Wall Street	11:16
16	or large portions of those meetings?	11:15	16	Journal" article from October 22, 2017 and it goes on	11:17
17	MR. GAVENMAN: Objection --	11:15	17	for about six pages.	11:17
18	MR. GREIM: Objection.	11:15	18	A. Right.	11:17
19	MR. GAVENMAN: -- to form. You're talking	11:15	19	Q. But you'll see that the main topic here	11:17
20	about a privileged conversation?	11:15	20	is about the visit of the Chinese officials to Mr.	11:17
21	MR. GREIM: No. I'm sorry. Let me -- not	11:15	21	Guo.	11:17
22	meetings with Clark Hill.	11:15	22	A. Right.	11:17
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1	MR. GAVENMAN: Okay.	11:15	1	Q. Correct?	11:17
2	BY MR. GREIM:	11:15	2	A. Um-hum.	11:17
3	Q. Are you aware that Mr. Guo recorded all	11:15	3	Q. And is that a picture of Mr. Guo at the	11:17
4	or portions of his meetings with Chinese officials?	11:15	4	top there?	11:17
5	MR. GAVENMAN: Objection.	11:15	5	A. Yes.	11:17
6	MR. GREIM: Objection to form, relevance.	11:15	6	Q. Is that taken in his Sherry Netherland	11:17
7	THE WITNESS: With the counsel. That was	11:15	7	apartment?	11:17
8	also with counsel.	11:15	8	MR. GREIM: Objection.	11:17
9	BY MR. GREIM:	11:15	9	THE WITNESS: It looks like it.	11:17
10	Q. I'm sorry. I could not actually hear	11:15	10	BY MR. GREIM:	11:17
11	your answer over the objections. You're saying, yes,	11:15	11	Q. All right. Do you see in the third	11:17
12	he recorded meetings with counsel?	11:15	12	paragraph, it says: "Liu Yanping, the lead official,	11:17
13	MR. GAVENMAN: No.	11:15	13	said he had come on behalf of Beijing 'to find a	11:17
14	THE WITNESS: No. I said that's information	11:15	14	solution', according to Mr. Guo and a partial audio	11:18
15	--	11:15	15	recording Mr. Guo said he made of the May encounter	11:18
16	MR. GAVENMAN: Mr. Han. Mr. Han.	11:15	16	and posted online in September."	11:18
17	So what he's saying is, again, there was	11:15	17	Do you see that?	11:18
18	conversations with counsel present that were	11:15	18	A. Um-hum.	11:18
19	privileged conversations where he discussed this	11:15	19	Q. Now let me ask you -- I don't want to	11:18
20	material. So he cannot get into that area. That's	11:15	20	know -- well, unfortunately, you've got this	11:18
21	what he's saying.	11:15	21	continuing instruction and if you heard it from	11:18
22	Please do not answer.	11:15	22	counsel, you can't even state the facts. I'm going	11:18
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1	to ask you whether you recall reading articles like	11:18	1	THE WITNESS: That is with the counsel in the	11:20
2	this about Mr. Guo's recording of the May encounter.	11:18	2	meeting.	11:20
3	MR. GRENDI: Objection.	11:18	3	MR. GREIM: Wait a minute. Wait, wait, wait.	11:20
4	THE WITNESS: This is the first time I read	11:18	4	Now, whether he's listened to it is not	11:20
5	this article.	11:18	5	privileged information. I'm not going to ask him the	11:20
6	BY MR. GREIM:	11:18	6	content of it, but it's a yes or no question -- yes	11:21
7	Q. Okay. Well, when you first met Mr. Guo,	11:18	7	or no answer whether he has listened to it. I don't	11:21
8	I suppose this had already happened, hadn't it?	11:18	8	want to know anything else about the circumstance.	11:21
9	Because you said you met him for the first time in	11:19	9	MR. GAVENMAN: I'm also very concerned here	11:21
10	July or August?	11:19	10	about attorney work product privilege and what's	11:21
11	A. Correct.	11:19	11	happening in that case. I mean, it's not just the	11:21
12	MR. GRENDI: Objection.	11:19	12	facts. It's not just what communications. There's	11:21
13	BY MR. GREIM:	11:19	13	attorney work product that's happening here, clearly,	11:21
14	Q. By the way, have you met Steven Bannon	11:19	14	and you need to stay away from it.	11:21
15	before?	11:19	15	You need to stay away. I don't know why	11:21
16	MR. GRENDI: Objection. What does that have	11:19	16	you're bothering to go in there anyway, recordings,	11:21
17	to do with this case, Counsel? I'm sorry, but Steve	11:19	17	not recordings. I mean, we don't need to be invading	11:21
18	Bannon, where does he come in? I just don't get it.	11:19	18	this privilege to get to the facts of this case.	11:21
19	MR. GREIM: Read the counterclaim.	11:19	19	I mean, we're going to have a long day here	11:21
20	MR. GRENDI: I have. You put in stuff about	11:19	20	if we're doing this and let's stay away from	11:21
21	Steve Bannon that has nothing to do with the case.	11:19	21	privileged information and get to the parts that	11:21
22	MR. GREIM: Please don't use up our time on	11:19	22	matter, please.	11:21
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1	the record.	11:19	1	MR. GREIM: Well, we disagree to your claims	11:21
2	Go ahead.	11:19	2	of privilege. We're just trying to work around them	11:21
3	THE WITNESS: Before this?	11:19	3	so that we can get through.	11:21
4	BY MR. GREIM:	11:19	4	BY MR. GREIM:	11:21
5	Q. Yes.	11:19	5	Q. Did you -- let me -- okay. Let's go a	11:21
6	A. Before what?	11:19	6	little further.	11:22
7	Q. Well, let's say when did you -- have you	11:19	7	Why did you say that this incident of Mr. Guo	11:22
8	worked with Mr. Bannon in connection with Mr. Guo?	11:19	8	meeting with the Chinese officials may have been a	11:22
9	MR. GAVENMAN: Objection to form.	11:19	9	turning point for Mr. Guo?	11:22
10	MR. GRENDI: Objection.	11:19	10	MR. GRENDI: Objection.	11:22
11	THE WITNESS: Bannon was introduced to him on	11:19	11	MR. GAVENMAN: Objection.	11:22
12	October, early October of 2017.	11:19	12	THE WITNESS: I think because they were	11:22
13	BY MR. GREIM:	11:19	13	arrested, detained by the FBI. I think the Chinese	11:22
14	Q. By you?	11:19	14	official may have believed that Miles sold them out	11:22
15	A. By Bill Gertz, not me.	11:19	15	and that he's working with American Government,	11:23
16	Q. Now, how do you know that?	11:20	16	busted them, take away their cellphones, computers.	11:23
17	A. Because I was with them.	11:20	17	Yeah.	11:23
18	Q. Okay. Have you ever listened to a	11:20	18	BY MR. GREIM:	11:23
19	recording of Mr. Guo's meeting with Chinese	11:20	19	Q. All right. So that's -- I understand	11:23
20	officials?	11:20	20	that's what you think the Chinese officials may	11:23
21	MR. GRENDI: Objection.	11:20	21	believe.	11:23
22	MR. GAVENMAN: Objection.	11:20	22	A. Right.	11:23
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1	Q. Now my next question is how do you know	11:23	1	THE WITNESS: I don't know. This is a little	11:25
2	-- what makes you believe that? What facts do you	11:23	2	too far, you know.	11:25
3	have that form the basis for that belief?	11:23	3	MR. GRENDI: I'm just going to hop in here.	11:25
4	MR. GAVENMAN: Objection to form.	11:23	4	If we went to the judge with this right now, she	11:25
5	MR. GRENDI: Objection.	11:23	5	would say why are you asking these questions, please	11:25
6	THE WITNESS: I think since then, there was a	11:23	6	move it along. I'm pretty sure that's what she would	11:25
7	-- as far as I can tell, the Chinese never sent	11:23	7	say, because this has zero connection to whether or	11:25
8	another team to communicate with Miles, just on my	11:23	8	not Eastern Profit --	11:26
9	knowledge, based on my best knowledge.	11:23	9	THE WITNESS: Can I get some water?	11:26
10	BY MR. GREIM:	11:24	10	MR. GRENDI: -- and Strategic Vision --	11:26
11	Q. Since then, has Guo sent anyone to China	11:24	11	MR. GREIM: Why don't we do this. We have	11:26
12	to communicate with Chinese officials?	11:24	12	five minutes left. I mean, this goes directly to	11:26
13	A. I don't know.	11:24	13	whether Mr. Guo is working with the regime or not.	11:26
14	MR. GRENDI: Objection.	11:24	14	This would be one of the contacts, but let's take a	11:26
15	MR. GAVENMAN: Objection to form.	11:24	15	break. We have five minutes left on the tape. Let's	11:26
16	THE WITNESS: I have no knowledge.	11:24	16	take about a five- or ten-minute break.	11:26
17	BY MR. GREIM:	11:24	17	VIDEOGRAPHER: This end Disk No. 1, going off	11:26
18	Q. Do you know whether Guo sent Steve	11:24	18	the record. The time is now 11:28 a.m.	11:26
19	Bannon to communicate with Wang Qishan?	11:24	19	[Recess.]	11:41
20	MR. GAVENMAN: Objection.	11:24	20	VIDEOGRAPHER: This begins Disk No. 2 in the	11:41
21	MR. GRENDI: Objection, relevance.	11:24	21	video deposition of Lianchao Han. We are back on the	11:41
22	THE WITNESS: That's not possible.	11:24	22	record. The time is 11:43 a.m.	11:41
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1	BY MR. GREIM:	11:24	1	BY MR. GREIM:	11:41
2	Q. Why do you say that?	11:24	2	Q. Okay. Mr. Han --	11:41
3	A. Wang Qishan invited Bannon to China	11:24	3	A. Yes.	11:41
4	before he even know who Miles Kwok is.	11:24	4	Q. -- I'm going to make sure something is	11:41
5	Q. Before who knows who Miles Kwok was?	11:24	5	very clear from our last series of questions. Is it	11:41
6	A. Before Steve had ever heard his name.	11:24	6	true that you have knowledge of the purpose of the	11:42
7	Q. How do you know that?	11:24	7	Bannon trip to Wang Qishan?	11:42
8	A. Because at the time, he was -- the	11:24	8	MR. GRENDI: Objection.	11:42
9	timeline, just look at the timeline. I forgot when	11:24	9	MR. GAVENMAN: Objection.	11:42
10	he went to China, but that was way before Steve met	11:25	10	You can answer.	11:42
11	with the Miles Kwok.	11:25	11	THE WITNESS: I don't know exactly what's the	11:42
12	Q. Do you know who arranged the Bannon-Wang	11:25	12	purpose, but I know for a fact it has nothing to do	11:42
13	Qishan meeting?	11:25	13	with Miles Kwok.	11:42
14	MR. GRENDI: Objection.	11:25	14	BY MR. GREIM:	11:42
15	MR. GAVENMAN: Objection.	11:25	15	Q. Well, now that you -- I have to ask you	11:42
16	THE WITNESS: Is that relevant? I think John	11:25	16	how do you know for a fact it has nothing to do with	11:42
17	Thornton.	11:25	17	it?	11:42
18	BY MR. GREIM:	11:25	18	A. Because Steve talked to me about his	11:42
19	Q. And do you know whether Bannon discussed	11:25	19	trip.	11:42
20	Guo with Wang Qishan?	11:25	20	Q. Okay. What did he tell you? What did	11:42
21	MR. GAVENMAN: Objection.	11:25	21	he tell you the purpose of the trip was?	11:42
22	MR. GRENDI: Objection. How would he know?	11:25	22	MR. GRENDI: Objection. Why are we talking	11:42
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1	about a trip when the witness just said it has	11:42	1	that I can show you here in a moment, but I just want	11:45
2	nothing to do with this case?	11:42	2	you to take a look at this and tell me whether, now	11:46
3	MR. GREIM: Well, he said it doesn't. He was	11:42	3	having looked through this document, you have ever	11:46
4	about to tell us why it doesn't.	11:42	4	heard of it or seen it before.	11:46
5	THE WITNESS: First of all, Steve didn't know	11:42	5	A. Never heard, never seen this before.	11:46
6	Miles. He never heard of Miles before this trip. I	11:42	6	Can I see the Chinese version?	11:46
7	mean during this during this trip.	11:42	7	Q. Yes. I'm going to play for you a	11:46
8	He met with Miles on October 6th, I think I	11:42	8	newscast with, I believe, the Mirror in which Mr.	11:46
9	believe of 2017. So he didn't know, and that meeting	11:42	9	Wengui discusses -- I'm sorry -- Mr. Guo discusses	11:46
10	was about economic nationalism. Wang Qishan lectured	11:43	10	the letter. I'm going to go ahead for our counsel	11:46
11	him for the entire session of his meeting. That's	11:43	11	here and I'm going to go ahead and mark as Exhibit 6	11:46
12	what Bannon told me.	11:43	12	a transcription and translation of that. Again, this	11:46
13	BY MR. GREIM:	11:43	13	has been previously produced to counsel and the	11:47
14	Q. Is that the extent of your knowledge	11:43	14	translation is accompanied with an affidavit of the	11:47
15	about the trip?	11:43	15	translator, Jessica Ju. This is from	11:47
16	A. Correct.	11:43	16	https://youtu.be/7qVmEsw_ZX8, and it was published on	11:47
17	Q. All right. Have you ever discussed the	11:43	17	January 18, 2018.	11:47
18	trip with Guo Wengui?	11:43	18	What I'm going to do, sir, is I'm going to try	11:47
19	A. No, because the meeting, you know, what	11:43	19	to make sure you can see my screen, because the	11:47
20	Steve and Miles, when we sit down, Steve told what	11:43	20	newscast --	11:47
21	happened.	11:43	21	[Video presentation.]	11:47
22	Q. Okay. I'm sorry. Steve told Miles what	11:43	22	MR. GREIM: I'm pausing it. What I'm going	11:48
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1	happened?	11:43	1	to do is move my computer closer to you without	11:48
2	A. Steve, me, Miles, we have a dinner,	11:43	2	wrecking the entire setup that we have here.	11:48
3	several dinners. So I think at the beginning, you	11:44	3	THE WITNESS: Yeah. Oh, that's the Chinese	11:48
4	know, he mentioned about this trip. He described the	11:44	4	version?	11:48
5	meeting with Wang Qishan.	11:44	5	MR. GREIM: Yes, sir, but I just encourage	11:48
6	Q. Are you aware of a letter that Mr. Guo	11:44	6	you to listen, and if there were even a way for you	11:48
7	wrote to President Xi in August of 2017?	11:44	7	to pause as you need to --	11:48
8	A. I didn't.	11:44	8	THE WITNESS: Yeah.	11:48
9	Q. Have you ever heard of that before?	11:44	9	MR. GREIM: -- I'll try to allow that.	11:48
10	A. No.	11:44	10	THE WITNESS: Okay.	11:48
11	[Han Exhibit No. 5 was	11:44	11	MR. GREIM: And what you may do is, if you	11:48
12	marked for identification.]	11:45	12	know how to work this --	11:48
13	BY MR. GREIM:	11:45	13	THE WITNESS: That's fine. I can listen.	11:48
14	Q. I'm going to show you what we are	11:45	14	MR. GREIM: Okay.	11:48
15	marking as Exhibit 5, and what I'm showing you here	11:45	15	[Video presentation.]	11:49
16	is a certified translation that was filed in the New	11:45	16	THE WITNESS: This is a half an hour thing.	11:49
17	York County Supreme Court in another matter, and this	11:45	17	Are we going to go through everything?	11:49
18	purports to be a letter from Guo Wengui to the	11:45	18	[Mr. Greim gestures in the negative.]	11:50
19	Honorable Leader, parentheses "S". It starts with	11:45	19	[Continued video presentation.]	11:53
20	"Greetings" and it's signed, Respectfully, s/Guo	11:45	20	MR. GREIM: All right. I have stopped this	11:56
21	Wengui, August 26, 2017.	11:45	21	exactly at seven minutes and thirty seconds. As the	11:56
22	Now, I've got an actual Chinese copy of this	11:45	22	witness points out, this particular clip is a total	11:56
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<p>1 of about 23 minutes and eventually goes to 31:43. We 11:56</p> <p>2 won't play the entire clip here, but we can if it's 11:56</p> <p>3 necessary. 11:56</p> <p>4 BY MR. GREIM: 11:56</p> <p>5 Q. So my question to the witness, first of 11:56</p> <p>6 all, is that -- what did you see, first of all, on 11:56</p> <p>7 the video? 11:56</p> <p>8 A. What did I see? 11:56</p> <p>9 Q. Sure. 11:56</p> <p>10 MR. GRENDI: I'll just object to line of 11:56</p> <p>11 questioning. 11:56</p> <p>12 THE WITNESS: Just, you know, it's his letter 11:56</p> <p>13 to the Chinese leaders and he explains who he 11:56</p> <p>14 addressed it to. 11:56</p> <p>15 BY MR. GREIM: 11:56</p> <p>16 Q. And who is interviewing Mr. Guo? 11:56</p> <p>17 A. Chen Xiaoping. 11:57</p> <p>18 Q. Who is that? 11:57</p> <p>19 A. Chen Xiaoping is the host of Mirror Tv. 11:57</p> <p>20 Q. This is the TV program you mentioned 11:57</p> <p>21 earlier? 11:57</p> <p>22 A. Correct. 11:57</p> <p style="text-align: right;">Page 102</p>	<p>1 THE WITNESS: Just exactly the same letter, 11:58</p> <p>2 just done into segments. 11:58</p> <p>3 BY MR. GREIM: 11:58</p> <p>4 Q. Okay. And so let me ask you again, now 11:58</p> <p>5 that you've seen it in Chinese -- 11:58</p> <p>6 A. Yeah. 11:58</p> <p>7 Q. -- and you've heard Mr. Guo talking 11:58</p> <p>8 about it, had you ever heard of this letter before 11:58</p> <p>9 today? 11:58</p> <p>10 MR. GAVENMAN: Objection, form. 11:58</p> <p>11 THE WITNESS: No. This is the first time I 11:58</p> <p>12 saw this video clip. I didn't know the letter. 11:58</p> <p>13 BY MR. GREIM: 11:58</p> <p>14 Q. Okay. Well, if we could go to the 11:58</p> <p>15 English version -- 11:58</p> <p>16 A. Yes. 11:58</p> <p>17 Q. -- you'll see that the beginning of the 11:58</p> <p>18 letter after the word "Greetings" says: "Thank you 11:58</p> <p>19 very much for your hospitality to meet members of my 11:58</p> <p>20 family and staff yesterday." 11:59</p> <p>21 Do you see that? 11:59</p> <p>22 A. Yes. 11:59</p> <p style="text-align: right;">Page 104</p>
<p>1 Q. All right. And do you recognize Mr. Guo 11:57</p> <p>2 and Mr. Guo's voice answering his questions? 11:57</p> <p>3 A. Yes. 11:57</p> <p>4 Q. And did you hear Mr. Guo to ask the host 11:57</p> <p>5 that the letter be put up on the screen? 11:57</p> <p>6 A. Correct. 11:57</p> <p>7 MR. GRENDI: Objection. 11:57</p> <p>8 BY MR. GREIM: 11:57</p> <p>9 Q. And did you see the letter? 11:57</p> <p>10 A. Yes. 11:57</p> <p>11 Q. How many pages did it have? 11:57</p> <p>12 A. Four or five. Four. 11:57</p> <p>13 Q. Were you able to read it in Chinese? 11:57</p> <p>14 A. Yes. 11:57</p> <p>15 Q. And then after the actual letter was 11:57</p> <p>16 shown, did you see a transcription that followed 11:57</p> <p>17 while some piano music played? 11:57</p> <p>18 A. Yes. 11:57</p> <p>19 Q. What were Chinese characters in the 11:57</p> <p>20 transcription after the letter? 11:57</p> <p>21 MR. GRENDI: Objection. 11:57</p> <p>22 MR. GAVENMAN: Objection. 11:57</p> <p style="text-align: right;">Page 103</p>	<p>1 MR. GAVENMAN: I'm just going to object to 11:59</p> <p>2 the extent this is not an accurate translation, just 11:59</p> <p>3 to that extent, but we can go on. 11:59</p> <p>4 MR. GRENDI: Same objection. 11:59</p> <p>5 BY MR. GREIM: 11:59</p> <p>6 Q. Now, we can go back to Chinese text, if 11:59</p> <p>7 you would like, sir, to take a look at the -- 11:59</p> <p>8 A. Yeah. Let's go back and see exactly. I 11:59</p> <p>9 think there is a mistranslation here. I can see at 11:59</p> <p>10 least one error here, but that's the Chinese -- the 11:59</p> <p>11 English version. It's the beginning of the letter, I 11:59</p> <p>12 think. 12:00</p> <p>13 Q. You're now looking at the beginning of 12:00</p> <p>14 the letter? 12:00</p> <p>15 A. Yeah. Can we enlarge this a little bit? 12:00</p> <p>16 Q. I'm afraid we can't. 12:00</p> <p>17 A. I can't read it. 12:00</p> <p>18 Q. Let me see if I can, sir. 12:00</p> <p>19 A. There it goes. 12:00</p> <p>20 Q. And you can feel free to use my controls 12:00</p> <p>21 on the my computer to move. We may have a few other 12:00</p> <p>22 questions on other pages here. 12:00</p> <p style="text-align: right;">Page 105</p>

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1	[Witness peruses document.]	12:00	1	translation.	12:03
2	THE WITNESS: Yeah.	12:00	2	BY MR. GREIM:	12:03
3	BY MR. GREIM:	12:01	3	Q. Well, what -- which of those conditions,	12:03
4	Q. So was there a mistranslation in the	12:01	4	are any of the conditions inaccurate in the	12:03
5	transcription that I showed you?	12:01	5	transcription?	12:03
6	A. Just for this part, no, for the first	12:01	6	A. Yeah. Roughly, it's correct, but he's	12:03
7	paragraph.	12:01	7	talking about like overseas, to stop overseas use the	12:03
8	Q. Okay. Now, are you aware of a -- other	12:01	8	army. He uses a specific term, sui jin. Sui jin	12:03
9	than the meeting that we talked about earlier in May,	12:01	9	means -- how to translate?	12:03
10	are you aware of another meeting between Mr. Guo and	12:01	10	Sui jin is the Communist hired thugs or hired	12:03
11	any Chinese officials?	12:01	11	crowds that's suing him. So that was not translated	12:03
12	A. No.	12:01	12	accurately.	12:04
13	Q. Do you see under paragraph 1 of the	12:01	13	Q. I see. So does that apply to the phrase	12:04
14	English translation, under paragraph 1, Mr. Guo is	12:01	14	that says "drop the illegal action that is being	12:04
15	making certain requests of the Chinese leaders? Are	12:01	15	taken against me overseas"?	12:04
16	you aware of him having made such requests in or	12:01	16	A. Yeah, but he's specifically -- by those	12:04
17	around August of 2017?	12:01	17	hired, you know, sui jin, army of Communist Party.	12:04
18	MR. GRENDI: Objection.	12:01	18	Q. Let me take you to the first -- if you	12:04
19	MR. GAVENMAN: Objection, form.	12:01	19	continue in that paragraph, there are some text in	12:04
20	THE WITNESS: I didn't know he made any	12:01	20	bold. It's in bold both in Chinese characters and in	12:04
21	requests, specific requests, like that, but I know	12:01	21	English translation.	12:04
22	there were -- he tried to negotiation -- tried to	12:02	22	A. Yeah.	12:04
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1	negotiate to protect his employees, his assets.	12:02	1	Q. And it says: "My current situation can	12:04
2	That, I know in general.	12:02	2	be summed up in eight Chinese characters", colon and	12:04
3	BY MR. GREIM:	12:02	3	then after that, it's bolded: "I am now doing things	12:04
4	Q. If you look on -- let's go to the second	12:02	4	not out of my own volition and talking things that I	12:04
5	paragraph. You'll see he says: "The key condition	12:02	5	do not really mean."	12:04
6	for me to desist from revealing information is that	12:02	6	Do you see that?	12:05
7	you take my name off the Red Notice --	12:02	7	A. I saw that.	12:05
8	A. Yes.	12:02	8	Q. Is that a correct Chinese translation?	12:05
9	Q. -- "permit me to resume the operation of	12:02	9	A. Roughly, yes.	12:05
10	my business in Hong Kong and drop the legal action	12:02	10	Q. Did Mr. Guo ever express a similar	12:05
11	that is being taken against me overseas."	12:02	11	sentiment to you?	12:05
12	Did I read that correctly?	12:02	12	MR. GRENDI: Objection.	12:05
13	A. Yes.	12:02	13	BY MR. GREIM:	12:05
14	Q. And can you satisfy yourself that that	12:02	14	Q. About his speech in the United States?	12:05
15	is, in fact, what's in the Chinese version of the	12:02	15	MR. GAVENMAN: Objection, form.	12:05
16	letter?	12:02	16	MR. GRENDI: Objection.	12:05
17	And if you need to, if it's not on this page,	12:02	17	THE WITNESS: No.	12:05
18	we can toggle to the next.	12:02	18	BY MR. GREIM:	12:05
19	A. Okay.	12:03	19	Q. Then if you go on, there's some more	12:05
20	[Witness peruses document.]	12:03	20	that's bolded. I want to ask you about the English	12:05
21	THE WITNESS: It's roughly correct, but it's	12:03	21	sentence that says: "My public exposures of	12:05
22	not straight -- you know, it's not an accurate	12:03	22	information before."	12:05
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1	A. Where is that?	12:05	1	very end and then we're just about done with this,	12:07
2	Q. It's about two sentences later?	12:05	2	sir.	12:08
3	A. Here, in the English?	12:05	3	A. All right.	12:08
4	Q. Oh, yes, in the English. I'm just going	12:05	4	Q. If you go to page 5 of the	12:08
5	to point out to you.	12:05	5	transcription -- actually, I think it's really page	12:08
6	A. Okay.	12:05	6	3. Sorry. You'll see that there is a little six.	12:08
7	Q. "My public exposures of information	12:05	7	A. Yeah.	12:08
8	before was done under coercion. My choice to perform	12:05	8	Q. It says "A few".	12:08
9	publicly was not voluntary."	12:05	9	A. Yes.	12:08
10	Do you see that in the Chinese?	12:05	10	Q. Actually, before we get there, it's	12:08
11	A. Yeah. It's not a very accurate	12:05	11	really under five. I apologize. You'll see it says:	12:08
12	translation.	12:06	12	"I will put our national interest first and I am	12:08
13	Q. Okay. How would you, if you could --	12:06	13	willing to devote my life to protecting our nation's	12:08
14	what is inaccurate about it?	12:06	14	interest to defend Chairman Xi Jinping's value as our	12:08
15	MR. GAVENMAN: Objection to form.	12:06	15	nation's core faith and make ultimate dedication of	12:08
16	MR. GRENDI: Objection.	12:06	16	myself to safeguard Chairman Xi Jinping."	12:08
17	THE WITNESS: Let's see. So he basically	12:06	17	Did I read that correctly?	12:08
18	says they hold the entire situation, it's not alone I	12:06	18	A. Yes, you read that correctly, but let me	12:08
19	can decide and control, and it's involved with my --	12:06	19	just see what's the Chinese version.	12:08
20	the country I reside in and other relevant interests,	12:06	20	Q. Absolutely. Let's go there.	12:08
21	stakeholders.	12:06	21	[Video presentation.]	12:09
22	BY MR. GREIM:	12:06	22	THE WITNESS: This is No. 5?	12:09
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1	Q. That actually wasn't the sentence I read	12:06	1	BY MR. GREIM:	12:09
2	to you, but I see that.	12:06	2	Q. Yes, sir. Do we need to go to another	12:09
3	A. Right. Right, but after that, he says,	12:06	3	page?	12:09
4	you know, like the whistle-blowing exposure before	12:06	4	A. No, no. This is the page.	12:09
5	was forced and also like a reluctant choice.	12:07	5	[Witness peruses document.]	12:09
6	Q. I see.	12:07	6	THE WITNESS: Yeah. I get it.	12:10
7	A. So that would be my understanding of the	12:07	7	BY MR. GREIM:	12:10
8	translation.	12:07	8	Q. Is that an accurate translation?	12:10
9	Q. So instead of done under coercion and	12:07	9	MR. GRENDI: Objection.	12:10
10	was not voluntary, you would say forced?	12:07	10	THE WITNESS: It's not -- you know, I think	12:10
11	A. Yes, because how you translate the whole	12:07	11	it's exaggerated a little bit on the side of -- yeah.	12:10
12	paragraph, the context of the thing.	12:07	12	It's a different tone, yeah, different. The scale of	12:10
13	Q. Did Mr. Guo ever tell you that he felt	12:07	13	emphasis, yeah, roughly correct.	12:10
14	he was forced to engage in his whistle-blowing speech	12:07	14	BY MR. GREIM:	12:10
15	in the U.S.?	12:07	15	Q. Okay. I mean, the English translation	12:10
16	MR. GRENDI: Objection.	12:07	16	ends with an exclamation point. Right?	12:10
17	THE WITNESS: I don't think so, because it	12:07	17	A. Right. Chinese also.	12:10
18	depends on, you know, how it's forced, forced by the	12:07	18	Q. Chinese also, okay. So what is it in	12:10
19	situation, forced by the individual. He didn't	12:07	19	the English translation that you would change then?	12:10
20	specify that.	12:07	20	I want to make sure I understand precisely where you	12:10
21	BY MR. GREIM:	12:07	21	disagree with this translation.	12:10
22	Q. If you could go to -- let's go to the	12:07	22	MR. GRENDI: Objection.	12:10
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1	THE WITNESS: Let's see I think it's the	12:10	1	resources momentarily into best serving Chairman Xi	12:13
2	tone. Yeah. It's not -- I mean, it's roughly	12:10	2	Jinping's Chinese Dream", exclamation point.	12:13
3	correct.	12:10	3	A. Yes.	12:13
4	BY MR. GREIM:	12:10	4	Q. Is that fair?	12:13
5	Q. Okay.	12:10	5	A. Yes.	12:13
6	A. That's my -- the tone seems to me more	12:10	6	Q. And then under -- let's skip to "G".	12:13
7	weighted on, you know, how he's going to devote	12:11	7	A. "G"?	12:13
8	everything.	12:11	8	Q. Which might have to be the next page	12:13
9	Q. Do you have any doubt that Mr. Guo	12:11	9	now.	12:13
10	actually sent this letter?	12:11	10	A. Yeah.	12:13
11	A. I have no idea if he did or not.	12:11	11	[Video presentation.]	12:13
12	Q. Okay. Let me take you now to the final	12:11	12	THE WITNESS: Yes.	12:13
13	part of this paragraph 6, and that may go into the	12:11	13	BY MR. GREIM:	12:14
14	next page. Do we need to change yet?	12:11	14	Q. And the English translation is in bold	12:14
15	A. No, not yet. Let me just see what you	12:11	15	and italics. It says: "Assign me tasks to	12:14
16	want.	12:11	16	accomplish in furtherance of our national interests	12:14
17	Q. So you see six says: "A few small	12:11	17	initiative and engage in Chairman Xi Jinping's global	12:14
18	suggestions from the bottom of Wengui's heart."	12:11	18	strategy so that I can redeem myself by my good	12:14
19	A. Yeah.	12:11	19	service, demonstrating my patriotism and loyalty to	12:14
20	Q. Then he has actually, A, B, C, D, E, F,	12:11	20	Chairman Xi Jinping."	12:14
21	and G.	12:11	21	Did I read that correctly?	12:14
22	A. Correct.	12:11	22	A. This is number -- it should be number	12:14
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1	Q. And so if you look under "A", he says:	12:11	1	what? Let's see.	12:14
2	"Give Wengui an opportunity to chant for our nation."	12:11	2	Q. "G", 6(g).	12:14
3	And then the translator says that they have	12:12	3	A. One, two, three, four, five, six, seven.	12:14
4	added Communist China. Do you see?	12:12	4	The last one?	12:14
5	A. Yeah.	12:12	5	Q. Correct.	12:14
6	Q. That's not in the Chinese. Correct?	12:12	6	A. Yeah. Yes.	12:14
7	A. No. That's not in Chinese.	12:12	7	Q. Is that an accurate translation?	12:15
8	Q. Then he says: "In advocating our	12:12	8	A. Not quite.	12:15
9	nation's legal system solely for propagandizing	12:12	9	Q. What is off in the translation?	12:15
10	Chairman Xi Jinping's call for the Rule of Law in	12:12	10	A. I think he says let's redeem myself,	12:15
11	China", exclamation point.	12:12	11	like let me correct my mistakes and perform, you	12:15
12	A. Right, but that's also -- this	12:12	12	know, like contribute. Yeah.	12:15
13	translation is bad. It's not accurate. Yeah. It	12:12	13	Q. So other than -- so you would change	12:15
14	is, you know, like advocating for nation's legal	12:12	14	"redeem" to "correct my mistakes"?	12:15
15	system beauty.	12:12	15	A. Yeah.	12:15
16	Q. Okay. And does it --	12:12	16	Q. And will you have any change to good	12:15
17	A. There's no for propaganda. You know,	12:12	17	service, demonstrating my patriotism and loyalty to	12:15
18	like a -- yeah. There is that propaganda. Sorry.	12:12	18	Chairman Xi Jinping?	12:15
19	Advocate, you can see advocate for Xi Jinping's Rule	12:12	19	A. That is -- it's not accurate	12:15
20	of Law in Chinese. It's a matter of translation.	12:12	20	translation, because I want to use the translation,	12:16
21	Q. Okay. And then if you look at "B":	12:13	21	direct translation, literal translation, use the	12:16
22	"Can you consider to convert Wengui's influence and	12:13	22	result to express my support of Xi and my patriots.	12:16
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1	Q. Very well. Okay. Now, have you ever	12:16	1	MR. GRENDI: Objection to form.	12:18
2	heard Guo Wengui express similar sentiments?	12:16	2	THE WITNESS: I don't specifically know that.	12:18
3	A. No.	12:16	3	BY MR. GREIM:	12:18
4	Q. And when you helped to set up the	12:16	4	Q. Did he do it after this?	12:18
5	meeting between Strategic Vision and Guo Wengui, you	12:16	5	MR. GRENDI: Objection.	12:18
6	were not aware of this letter?	12:16	6	MR. GAVENMAN: Objection.	12:18
7	A. No.	12:16	7	THE WITNESS: I think there's plenty he did	12:18
8	Q. Do you know whether Guo Wengui received	12:16	8	after that, but I just didn't follow whatever he	12:18
9	the specific instructions he was asking for in this	12:16	9	said.	12:18
10	letter?	12:16	10	BY MR. GREIM:	12:18
11	MR. GAVENMAN: Objection to form.	12:16	11	Q. And your testimony is that you have no	12:18
12	MR. GRENDI: Objection.	12:16	12	knowledge of any other contacts -- well, let me	12:18
13	THE WITNESS: No, but he explained what	12:16	13	strike that.	12:18
14	instructions he got from the video.	12:16	14	You have no knowledge of any contacts that Guo	12:18
15	BY MR. GREIM:	12:16	15	or anyone working on his behalf had with the Chinese	12:18
16	Q. Oh. Do you believe in the video, he	12:16	16	Government after August of 2017?	12:18
17	actually explains the instructions he did receive?	12:17	17	MR. GRENDI: Objection.	12:19
18	A. Yes. Yes. You have to give the	12:17	18	MR. GAVENMAN: Objection, form.	12:19
19	transcript of the entire thing so you would know what	12:17	19	THE WITNESS: August of 2017? No.	12:19
20	he's talking about.	12:17	20	BY MR. GREIM:	12:19
21	Q. Well, is this based on what you have	12:17	21	Q. And do you know that he did not have	12:19
22	heard or what you see later in the transcript?	12:17	22	contacts with the Chinese Government after August of	12:19
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1	A. I heard.	12:17	1	2017?	12:19
2	Q. Okay. So --	12:17	2	MR. GAVENMAN: Objection.	12:19
3	A. Just now.	12:17	3	MR. GRENDI: Objection.	12:19
4	Q. I'm sorry. Tell us. What did he say?	12:17	4	THE WITNESS: I don't have any knowledge	12:19
5	A. He said --	12:17	5	whether he has or have not.	12:19
6	MR. GRENDI: Objection. I just want to --	12:17	6	BY MR. GREIM:	12:19
7	hold on. I want to go the record. He didn't listen	12:17	7	Q. Do you know whether it's true that Mr.	12:19
8	to the whole video. So he's testifying as to what he	12:17	8	Guo has been unable to move money from Hong Kong	12:19
9	heard so far in the video.	12:17	9	after he began speaking out as a dissident?	12:19
10	MR. GREIM: I agree. I agree.	12:17	10	MR. GAVENMAN: Objection.	12:20
11	THE WITNESS: Yeah. Just the beginning part,	12:17	11	MR. GRENDI: Objection.	12:20
12	he specifically -- the interview -- the reporter	12:17	12	MR. GAVENMAN: Form and asked and answered,	12:20
13	asked him what instruction they give you. He	12:17	13	I'm fairly certain.	12:20
14	explained, basically, don't expose, you know, the	12:17	14	You can answer, but it's been asked before.	12:20
15	high-ranking government officials', you know,	12:17	15	THE WITNESS: Okay. I don't have that	12:20
16	corruption and don't use her Twitter, expose the	12:17	16	knowledge.	12:20
17	dirt.	12:18	17	BY MR. GREIM:	12:20
18	That's basically it. That's the instruction.	12:18	18	Q. Have you advised Mr. Guo on any	12:20
19	BY MR. GREIM:	12:18	19	statements that he or his attorney has made in the	12:20
20	Q. And do you know when Guo Wengui last	12:18	20	press about this case?	12:20
21	exposed dirt on a high-ranking public officials?	12:18	21	A. About this particular case, no.	12:20
22	MR. GAVENMAN: Objection.	12:18	22	MR. GRENDI: Objection.	12:20
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<p>1 THE WITNESS: And except at the very 12:20</p> <p>2 beginning, I advised him not to go forward with the 12:20</p> <p>3 lawsuit. 12:20</p> <p>4 BY MR. GREIM: 12:20</p> <p>5 Q. Okay. Let's forge ahead. The very -- 12:20</p> <p>6 did there come a time when you had a meeting just 12:20</p> <p>7 with French Wallop and Mike Waller -- 12:20</p> <p>8 A. Uh-huh. 12:20</p> <p>9 Q. -- before Mr. Guo was present? 12:20</p> <p>10 A. I don't have recollection. 12:21</p> <p>11 Q. Okay. Do you recall -- 12:21</p> <p>12 A. We might. 12:21</p> <p>13 Q. Okay. Well, do you recall having a 12:21</p> <p>14 meeting with them in order to determine whether you 12:21</p> <p>15 felt comfortable connecting Strategic Vision to Mr. 12:21</p> <p>16 Guo? 12:21</p> <p>17 A. I don't recall that, but I always 12:21</p> <p>18 caution all the people I introduce to Miles and 12:21</p> <p>19 including Hudson, that Miles, some of what he exposed 12:21</p> <p>20 is verified. Some is not verified and comes from the 12:21</p> <p>21 Chinese, you know, communist system and you never 12:21</p> <p>22 know, you know, what to expect. 12:21</p> <p style="text-align: right;">Page 122</p>	<p>1 A. Yeah. 12:23</p> <p>2 Q. -- I'm really referring to either French 12:23</p> <p>3 Wallop or Mike Waller. Okay? 12:23</p> <p>4 A. Yes. 12:23</p> <p>5 Q. So did you give them any other cautions 12:23</p> <p>6 about Mr. Guo? 12:23</p> <p>7 A. I don't recall. I probably did say 12:23</p> <p>8 something, yeah, because as I said, I warned on both 12:23</p> <p>9 sides to be cautious as they move forward. 12:23</p> <p>10 Q. Because in October or November of 2017, 12:23</p> <p>11 you had only known Mr. Guo for a few months. 12:23</p> <p>12 Correct? 12:23</p> <p>13 A. Correct. 12:23</p> <p>14 Q. And at that time, did you have some 12:23</p> <p>15 doubt about whether everything he had told you was 12:23</p> <p>16 true? 12:23</p> <p>17 MR. GRENDI: Objection to form. 12:23</p> <p>18 MR. GAVENMAN: Objection. 12:23</p> <p>19 THE WITNESS: I do have some doubt, but I 12:23</p> <p>20 think what he's done, the whistle-blowing, is very 12:24</p> <p>21 significant, is very disruptive to Chinese Communist 12:24</p> <p>22 regime. So based on that, I was there to help. 12:24</p> <p style="text-align: right;">Page 124</p>
<p>1 I did caution them. At the same time, I also 12:21</p> <p>2 cautioned Miles. I have never deal with Mike French 12:22</p> <p>3 in a business transaction. So I didn't know if they 12:22</p> <p>4 are -- you know, they can do whatever they can do. 12:22</p> <p>5 So I warned both sides. 12:22</p> <p>6 Q. And just so the testimony is clear, at 12:22</p> <p>7 the beginning of your answer, did you say that Mr. 12:22</p> <p>8 Guo came from the Chinese Communist system? 12:22</p> <p>9 MR. GRENDI: Objection. 12:22</p> <p>10 MR. GAVENMAN: Objection. 12:22</p> <p>11 THE WITNESS: Come from -- everybody in China 12:22</p> <p>12 comes out of the rule, the system of the CCP. That's 12:22</p> <p>13 my meaning. 12:22</p> <p>14 BY MR. GREIM: 12:22</p> <p>15 Q. Did you give Strategic Vision -- and by 12:22</p> <p>16 the way, when I say Strategic Vision -- 12:22</p> <p>17 A. I don't want to see your message. 12:22</p> <p>18 Q. Oh, you're right. You get to see 12:23</p> <p>19 everything here. 12:23</p> <p>20 [Witness views computer screen.] 12:23</p> <p>21 BY MR. GREIM: 12:23</p> <p>22 Q. When I say Strategic Vision -- 12:23</p> <p style="text-align: right;">Page 123</p>	<p>1 BY MR. GREIM: 12:24</p> <p>2 Q. And that was your state of mind at the 12:24</p> <p>3 time you introduced Mr. Guo to Strategic Vision? 12:24</p> <p>4 A. Correct. 12:24</p> <p>5 Q. Did you convey that -- did you convey 12:24</p> <p>6 those thoughts to Strategic Vision? 12:24</p> <p>7 MR. GRENDI: Objection to form. 12:24</p> <p>8 MR. GAVENMAN: Objection. 12:24</p> <p>9 THE WITNESS: I think I did, because I said 12:24</p> <p>10 some of what he said is not verifiable. You cannot 12:24</p> <p>11 verify it at the time and some, indeed, has been 12:24</p> <p>12 verified like HNA. 12:24</p> <p>13 BY MR. 12:24</p> <p>14 Q. Did they include his attendance at the 12:24</p> <p>15 Tieneman Square massacre? 12:24</p> <p>16 MR. GRENDI: Objection. 12:24</p> <p>17 MR. GAVENMAN: Objection, form, privilege, 12:24</p> <p>18 we've established. He's not answering that question. 12:25</p> <p>19 THE WITNESS: I'm not answering that 12:25</p> <p>20 question, yeah. 12:25</p> <p>21 BY MR. GREIM: 12:25</p> <p>22 Q. Did you advise Strategic Vision that it 12:25</p> <p style="text-align: right;">Page 125</p>

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1	should obtain a deposit from Mr. Guo?	12:25	1	think he read it, because his English was not good at	12:27
2	MR. GRENDI: Objection.	12:25	2	the time.	12:27
3	THE WITNESS: I don't recall that. I might.	12:25	3	Q. So you didn't translate it for him?	12:27
4	I might have.	12:25	4	A. No.	12:27
5	BY MR. GREIM:	12:25	5	Q. Do you recall what Strategic Vision's	12:27
6	Q. At that point, by, let's say, November	12:25	6	initial proposal was?	12:28
7	of 2017, were you aware of concerns with Mr. Guo not	12:25	7	A. I didn't remember, but I think mostly	12:28
8	paying everyone he had hired to do specific tasks?	12:25	8	it's how to help him, media strategy, communication	12:28
9	MR. GRENDI: Objection.	12:25	9	strategy, that sort of thing.	12:28
10	MR. GAVENMAN: Objection.	12:25	10	Q. Okay. Do you remember where that	12:28
11	THE WITNESS: No.	12:25	11	meeting was? I know your memory is not good of the	12:28
12	BY MR. GREIM:	12:25	12	very first meeting, but do you remember where you	12:28
13	Q. So other than your statement about Mr.	12:25	13	would have met French and Michael?	12:28
14	Guo, what did you -- what, if anything, did you tell	12:26	14	A. I don't know where that meeting, the	12:28
15	Strategic Vision about potential projects for Guo?	12:26	15	first meeting, I met with them, whether it was before	12:28
16	A. Say that again.	12:26	16	we go to New York or, you know, we met in New York.	12:28
17	Q. Let me just -- it was a confusing	12:26	17	So but definitely, the first -- the meeting we had, I	12:28
18	question.	12:26	18	remember is in New York, the apartment of Miles Kwok.	12:28
19	In your very first meeting with Strategic	12:26	19	Q. Was it around Thanksgiving?	12:29
20	Vision --	12:26	20	A. It's November, yeah, during the time. I	12:29
21	A. Yeah.	12:26	21	don't know if it's, you know, Thanksgiving or close	12:29
22	Q. -- what, if anything, did you tell	12:26	22	to Thanksgiving.	12:29
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1	Strategic Vision about projects that Guo needed done?	12:26	1	MR. GREIM: All right. It is now about	12:29
2	A. I don't remember exactly the first	12:26	2	12:30. Why don't we -- I know we just took a break	12:29
3	meeting, what we discussed. I think the idea come to	12:26	3	about an hour ago. So why don't we take another	12:29
4	me to investigate through some conventional way, that	12:26	4	break for lunch. Let's make it like 45 minutes and	12:29
5	was later, probably later on, not the first meeting.	12:26	5	then we'll come back and just march through the	12:29
6	The first meeting was focused on how they can help	12:27	6	documents.	12:29
7	the communication, the P.R., but I don't remember	12:27	7	Does that make sense?	12:29
8	exactly when, you know.	12:27	8	MR. GAVENMAN: Sounds good.	12:29
9	Q. Did Strategic Vision bring any documents	12:27	9	MR. GREIM: Okay. Very good.	12:29
10	to that first meeting?	12:27	10	VIDEOGRAPHER: Going off the record. The	12:29
11	A. Yes. There is a proposal that I	12:27	11	time is now 12:31 p.m.	12:29
12	obtained pre -- before the meeting.	12:27	12	[Whereupon, at 12:31 p.m., a lunch recess was	12:29
13	Q. Okay.	12:27	13	taken, to reconvene at 1:15 p.m. this same day.]	12:29
14	A. To offer their services, specific	12:27	14		
15	services.	12:27	15		
16	Q. Did you share that proposal with Mr.	12:27	16		
17	Guo?	12:27	17		
18	A. I think I did.	12:27	18		
19	Q. Did you share it with Mr. Gertz?	12:27	19		
20	A. It had come from Gertz.	12:27	20		
21	Q. Okay.	12:27	21		
22	A. And I forwarded it to Miles. I don't	12:27	22		
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<p>1 AFTERNOON SESSION 12:29</p> <p>2 VIDEOGRAPHER: We are back on the record. 13:20</p> <p>3 The time is now 1:22 p.m. 13:20</p> <p>4 MR. GREIM: Let the record reflect the thumb 13:20</p> <p>5 drive from which I played two video clips that the 13:21</p> <p>6 witness viewed has been marked as Han Exhibit 7. 13:21</p> <p>7 We'll just keep this with the original exhibits, for 13:21</p> <p>8 now at least. 13:21</p> <p>9 [Han Exhibit No. 7 was 13:21</p> <p>10 marked for identification.] 13:21</p> <p>11 FURTHER EXAMINATION BY COUNSEL FOR 13:21</p> <p>12 DEFENDANT/COUNTERCLAIM PLAINTIFF 13:21</p> <p>13 BY MR. GREIM: 13:21</p> <p>14 Q. Okay. So, Mr. Han, earlier, we talked 13:21</p> <p>15 about a proposal that Strategic Vision had given to 13:21</p> <p>16 Mr. Gertz, who then gave to you. Do you recall that? 13:21</p> <p>17 A. Yes. 13:21</p> <p>18 MR. GREIM: I'm going to show you what we are 13:21</p> <p>19 marking as Exhibit 8. 13:21</p> <p>20 [Han Exhibit No. 8 was 13:21</p> <p>21 marked for identification.] 13:21</p> <p>22 MR. GREIM: I'm going to ask you take a look 13:21</p> <p style="text-align: right;">Page 130</p>	<p>1 not being forced to leave and lay out his long-term 13:23</p> <p>2 objectives of guiding historic change in his 13:23</p> <p>3 homeland. Did I read that right? 13:23</p> <p>4 A. Yes. 13:23</p> <p>5 Q. And are those the objectives that, even 13:23</p> <p>6 apart from the Strategic Vision work, you were trying 13:23</p> <p>7 to advise Mr. Guo on? 13:23</p> <p>8 MR. GREIM: Objection. 13:23</p> <p>9 MR. GAVENMAN: Objection. 13:23</p> <p>10 THE WITNESS: Yes. 13:23</p> <p>11 BY MR. GREIM: 13:23</p> <p>12 Q. Now, did you translate for Mr. Guo? 13:23</p> <p>13 A. I don't think so. I gave him a rough 13:24</p> <p>14 idea about what was proposed. 13:24</p> <p>15 Q. And would you agree with me that most of 13:24</p> <p>16 this document deals with, for lack of a better word, 13:24</p> <p>17 public relations? 13:24</p> <p>18 A. Pretty much, yes. 13:24</p> <p>19 Q. Or maybe, better, it would be public 13:24</p> <p>20 communications? 13:24</p> <p>21 A. I think it's public image. Also, if you 13:24</p> <p>22 look at the layout, help him to accomplish his 13:24</p> <p style="text-align: right;">Page 132</p>
<p>1 at that and see if you recognize this document. It's 13:21</p> <p>2 Bates labeled SVU77 to 79, and the top of the page 13:21</p> <p>3 says "Vision". 13:22</p> <p>4 There's also handwriting in the upper 13:22</p> <p>5 right-hand corner that says "1st Mtg w/Guo". 13:22</p> <p>6 [Witness peruses exhibit.] 13:22</p> <p>7 MR. GREIM: Can you repeat what the question 13:22</p> <p>8 is? 13:22</p> <p>9 THE WITNESS: Did you ask me a question? 13:22</p> <p>10 BY MR. GREIM: 13:22</p> <p>11 Q. All right. So, Mr. -- do you recognize 13:22</p> <p>12 this document, Mr. Han? 13:22</p> <p>13 A. Yeah. It looks like the original. Yes. 13:23</p> <p>14 Q. And I'll just ask you, if look at the 13:23</p> <p>15 very first paragraph, it says: "This is a vision 13:23</p> <p>16 from Mr. G." 13:23</p> <p>17 Is that Mr. Guo? 13:23</p> <p>18 A. Yes. 13:23</p> <p>19 Q. "To remain safely in this country and 13:23</p> <p>20 accomplish his mission back home." 13:23</p> <p>21 And then it presents a three-year roadmap to 13:23</p> <p>22 enable him to accomplish his immediate objectives of 13:23</p> <p style="text-align: right;">Page 131</p>	<p>1 objectives here, and I would say my perception at the 13:24</p> <p>2 beginning is the P.R., you know, strategic P.R. 13:24</p> <p>3 Q. What was Mr. Guo's reaction after you 13:24</p> <p>4 summarized this? 13:24</p> <p>5 A. I don't remember specifically what he 13:24</p> <p>6 reacted to it, how he reacted to it. I have no 13:25</p> <p>7 recollection. 13:25</p> <p>8 Q. Well, after you reviewed it, what was 13:25</p> <p>9 your reaction to it? 13:25</p> <p>10 A. I think this is, you know, for me, he 13:25</p> <p>11 needs someone to steer him through this media world, 13:25</p> <p>12 focused world. I think he needs someone to help him. 13:25</p> <p>13 You know, that's just my understanding. I 13:25</p> <p>14 think this is perfect for him as well. 13:25</p> <p>15 Q. At this point in time, did Mr. Guo have 13:25</p> <p>16 Guo Media yet? 13:25</p> <p>17 A. No. 13:25</p> <p>18 MR. GREIM: Objection. 13:25</p> <p>19 MR. GAVENMAN: Objection. 13:25</p> <p>20 THE WITNESS: No. 13:25</p> <p>21 BY MR. GREIM: 13:25</p> <p>22 Q. Have you heard of something called Guo 13:25</p> <p style="text-align: right;">Page 133</p>

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1	Media?	13:25	1	A. Yes.	13:29
2	A. No.	13:25	2	Q. And then it mentions a Washington	13:29
3	Q. Oh. You've never heard of that?	13:25	3	residence to show purpose and power and provide	13:29
4	A. I heard of Guo Media, yeah.	13:26	4	hospitality?	13:29
5	Q. What is it?	13:26	5	A. Yes.	13:29
6	A. That's his, Miles, his media platform, I	13:26	6	Q. Now, do you recall being involved in	13:29
7	think probably set up in 2018.	13:26	7	discussions between Strategic Vision and Mr. Guo	13:29
8	Q. Would it surprise you to learn that Mr.	13:26	8	about Washington, a Washington residence?	13:29
9	Guo doesn't know who owns Guo Media?	13:26	9	A. I think so. I remember that.	13:29
10	MR. GAVENMAN: Objection.	13:26	10	Q. And do you recall, in fact, Mr. Guo	13:29
11	MR. GRENDI: Objection.	13:26	11	talking to Strategic Vision about real estate	13:29
12	THE WITNESS: Nothing surprises me anymore.	13:26	12	purchases both in Washington and in New York?	13:29
13	MR. GREIM: All right. I'm now going to hand	13:26	13	MR. GRENDI: Objection.	13:29
14	you what's marked as Han Exhibit 9.	13:26	14	THE WITNESS: Yes. I think so.	13:29
15	[Han Exhibit No. 9 was	13:26	15	BY MR. GREIM:	13:29
16	marked for identification.]	13:26	16	Q. For example, do you recall that they	13:29
17	MR. GREIM: Sorry, guys. I'm just handing	13:26	17	discussed even buying the former home of David	13:29
18	them over across for your own internal distribution.	13:26	18	Rockefeller in New York?	13:29
19	MR. GRENDI: That's fine.	13:26	19	A. I didn't remember who initiated it, but	13:30
20	MR. GREIM: You'll see this is a four-page	13:26	20	I think there is such a discussion.	13:30
21	document Bates labeled SVUS000080 to 83, and it says	13:26	21	Q. And were the discussions about real	13:30
22	"Three-Year Timeline at the top. Please take a	13:27	22	estate and offices mixed in with the discussions	13:30
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1	second to review it, Mr. Han.	13:27	1	about public campaign?	13:30
2	[Witness peruses exhibit.]	13:27	2	MR. GAVENMAN: Objection, form.	13:30
3	THE WITNESS: Yeah.	13:28	3	MR. GRENDI: Objection.	13:30
4	BY MR. GREIM:	13:28	4	THE WITNESS: Yeah. It's hard for me to	13:30
5	Q. Have you seen this document before?	13:28	5	remember exactly. I think maybe they were separate	13:30
6	A. I might have. I have some recollection,	13:28	6	times or they were all together, yeah. Because it's	13:30
7	but it's not as clear as this one.	13:28	7	part of the package, it might have yeah, more likely.	13:30
8	Q. Well, if you look at the strategic	13:28	8	BY MR. GREIM:	13:30
9	objectives in the very beginning, the five bullet	13:28	9	Q. Okay. So they were discussed at the	13:30
10	points, while there are five bullet points, do they	13:28	10	same time?	13:30
11	seem similar to the objectives identified in Exhibit	13:28	11	MR. GRENDI: Objection.	13:30
12	8?	13:28	12	THE WITNESS: You know, sometimes when you	13:30
13	MR. GRENDI: Objection.	13:28	13	talk about real estate, I think they're purely	13:30
14	MR. GAVENMAN: Objection.	13:29	14	focused on real estate and not mentioned about some	13:30
15	THE WITNESS: Yeah.	13:29	15	other part. I mean, just sometimes, that might be	13:30
16	BY MR. GREIM:	13:29	16	mixed. So I don't recall specific events.	13:30
17	Q. And you'll see down under "Personal	13:29	17	BY MR. GREIM:	13:31
18	Presence", it says: "Create a personal presence in	13:29	18	Q. It's hard to generalize?	13:31
19	Washington."	13:29	19	A. Correct.	13:31
20	And then it goes on. Do you see that?	13:29	20	Q. Okay. Now, if you notice, in these four	13:31
21	A. Yes.	13:29	21	pages, there's still no discussion of a research	13:31
22	Q. On the very first page?	13:29	22	project. Do you agree with me?	13:31
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1	A. Correct.	13:31	1	A. No. It was purely my responsibility.	13:34
2	Q. So let me ask you do you recall when in	13:31	2	Q. So do you know where -- well, let me	13:34
3	these discussions a research project actually began	13:31	3	back up.	13:34
4	to be discussed?	13:31	4	Do you understand that the initial research	13:34
5	A. I didn't remember, but I know for a fact	13:31	5	was to occur on a set of 15 names?	13:34
6	I was the one who talked Miles into this. I	13:31	6	A. That was the nature, I think,	13:34
7	discussed with Mike and French to initiate this	13:31	7	originally. I don't know what names would be will.	13:34
8	research project.	13:31	8	Q. It was more amorphous at the beginning?	13:34
9	Q. So I'm going to make sure I understand	13:31	9	A. Correct.	13:34
10	your testimony.	13:31	10	MR. GRENDI: Objection.	13:34
11	A. Yes.	13:31	11	MR. GREIM: Well, let's see. I'm going to	13:34
12	Q. You -- did the research -- was the	13:31	12	now show you what we're going to mark as Exhibit 10.	13:34
13	research project discussed between you and French and	13:32	13	[Han Exhibit No. 10 was	13:34
14	Mike before it was discussed with Mr. Guo?	13:32	14	marked for identification.]	13:34
15	A. I didn't remember --	13:32	15	MR. GREIM: Wait a minute. This is a set of	13:35
16	MR. GAVENMAN: Form.	13:32	16	texts involving you, and I see -- let me make sure I	13:35
17	THE WITNESS: -- which comes first, but I	13:32	17	didn't --	13:35
18	come up with the idea, I believe to continue to	13:32	18	MR. GRENDI: You've got notes on one of them?	13:35
19	disrupt the Communist regime, we need sustainable	13:32	19	MR. GREIM: I thought I did. Maybe not.	13:35
20	fact-based, evidence-based exposure of Chinese	13:32	20	Maybe I don't.	13:35
21	corruption. So I thought, you know, this project	13:32	21	MR. GRENDI: Just for the record, this is the	13:35
22	could fill into that and I discussed with -- I don't	13:32	22	document you produced to me last night, you produced	13:35
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1	know who I discussed first, because I didn't know	13:32	1	to Eastern Profit last night?	13:35
2	there -- first, I think maybe I discussed with Mike	13:32	2	THE WITNESS: Correct. This is a -- these	13:35
3	and French whether they have the capability to do	13:32	3	are Bates numbered SVUS001842 to 1903 and they began	13:35
4	this, because in our conversation about these two	13:32	4	in November 12, 2017 and they go to July 15, 2018.	13:36
5	projects or, I mean, these two proposals, I	13:32	5	MR. GAVENMAN: Do you have a copy for me?	13:36
6	mentioned, I asked -- you know, they talked about	13:33	6	MR. GREIM: Unfortunately, I only have three	13:36
7	their accreditation for doing stuff for government,	13:33	7	copies. I was thinking there was something wrong	13:36
8	for contracts, for some other issues. I felt maybe I	13:33	8	here. So if you don't mind, if you guys can share.	13:36
9	asked them whether they have the capability to do	13:33	9	I'm sorry. I'm missing one copy of that set.	13:36
10	this type of research, and they gave me -- you know,	13:33	10	I hope that's not going to be the case for -- I've	13:36
11	they confirmed that they could have.	13:33	11	got other -- for some reason, we're missing one copy.	13:36
12	So I went back to Miles and said why don't we	13:33	12	I know what happened. I know what happened.	13:36
13	expand this proposal, do some research on those	13:33	13	[Discussion held off the record.]	13:37
14	corrupt officials; once we have solid evidence, we	13:33	14	MR. GREIM: This is the only one like this.	13:37
15	can expose them. So that's how it started.	13:33	15	So I'm sorry, everybody.	13:37
16	Q. Now, when you made this proposal to Mr.	13:33	16	BY MR. GREIM:	13:37
17	Guo, did you have in mind yet which officials should	13:33	17	Q. Okay. So I will represent to you that	13:37
18	be targeted?	13:33	18	this is a compendium of your texts with French Wallop	13:37
19	A. No, but I was -- mainly, I think we	13:33	19	and you'll see that they begin on November 12th.	13:37
20	understand the top officials.	13:33	20	A. Yes.	13:37
21	Q. Okay. By the way, did Mr. Gertz play a	13:34	21	Q. My question for you, by the way, os did	13:37
22	role in coming up with the idea of research?	13:34	22	you first meet French at lunch at her home with Bill	13:37
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1	Gertz before Mr. Waller was there? Do you recall that?	13:38	1	Wallop there is asking that the lunch be pushed back to one?	13:39
2		13:38	2		13:40
3	A. I don't.	13:38	3	A. Um-hum.	13:40
4	Q. Okay. Well, you'll see that you are writing to her on -- in the morning of the 12th and you say: "Hi, French. Great meeting you. I talked with Miles and he's eager to meet you. He wants to invite you to Mar a Lago now, but I think it's better to wait until I come back from Japan."	13:38	4	Q. I'm sorry. I'm sorry. I take that back. You see that you're asking that the lunch be pushed back because Bannon wants an urgent meeting at 11:30?	13:40
5		13:38	5		13:40
6		13:38	6		13:40
7		13:38	7		13:40
8		13:38	8	A. Yes.	13:40
9	And then you're proposing a meeting on the following week, on November the 19th. Do you see that?	13:38	9	Q. And by the way, was it common around this time for Bannon to have, you know, meetings with Mr. Guo?	13:40
10		13:38	10		13:40
11		13:38	11	MR. GAVENMAN: Objection.	13:40
12		13:38	12	MR. GRENDI: Objection.	13:40
13	A. Right.	13:38	13	THE WITNESS: Say that again.	13:40
14	MR. GRENDI: Objection.	13:38	14		13:40
15	BY MR. GREIM:	13:38	15	BY MR. GREIM:	13:40
16	Q. And you mention real estate. Correct?	13:38	16	Q. Was it common around this time for Bannon to have meetings with Mr. Guo?	13:40
17	A. Um-hum.	13:38	17		13:40
18	MR. GRENDI: Objection.	13:38	18	MR. GAVENMAN: Objection.	13:40
19	BY MR. GREIM:	13:38	19	MR. GRENDI: Objection.	13:40
20	Q. And you say: "His priority is the building opposite the Treasury."	13:38	20	THE WITNESS: Common? What do you mean,	13:40
21		13:38	21	common?	13:40
22	A. Um-hum.	13:38	22	BY MR. GREIM:	13:40
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1	Q. Okay. So by this point, do you believe you at least met French Wallop?	13:38	1	Q. Was it a --	13:40
2		13:38	2	A. Common practice?	13:40
3	A. Yeah. I might have.	13:38	3	Q. Yeah. Did it happen on a regular basis?	13:40
4	Q. And you already talked to Mr. Guo about her?	13:38	4	A. No, but Steve Bannon is very unpredictable. His schedule is always messed up.	13:40
5		13:38	5		13:40
6	A. Yes.	13:38	6	Always, we have to accommodate him. So that's common.	13:40
7	Q. Let's forge ahead here. Then you see he she wrote you back, your report back about Japan. You say: "Steve Bannon stirred up things here. I am happy."	13:39	7		13:40
8		13:39	8	Q. I see. If you go on now to page 45, you'll see that Ms. Wallop asked that you not disclose their identities to Mr. Bannon.	13:40
9		13:39	9		13:41
10	Did I read that right?	13:39	10	A. Correct.	13:41
11		13:39	11	Q. And you say, in fact, Mr. Guo does not know her name yet.	13:41
12	A. Yes.	13:39	12		13:41
13	Q. Let's continue marching on, and if you look at around November 20th, do you see that you're setting --	13:39	13	A. Correct.	13:41
14		13:39	14		13:41
15		13:39	15	Q. And does that sound right, that you did not disclose her name?	13:41
16	A. Where is the 20th?	13:39	16		13:41
17	Q. Oh. It's SVUS001844.	13:39	17	A. I didn't, yeah, because French asked me not to mention their names at all. At the early stage, I didn't. Steve Bannon even didn't know they were going to be in that meeting at one o'clock.	13:41
18	A. 44?	13:39	18		13:41
19	Q. Um-hum. You got ahead of us a little bit there.	13:39	19		13:41
20		13:39	20		13:41
21	A. Yes.	13:39	21	Q. Okay. Very good. If you -- let's flip ahead now to 1852.	13:41
22	Q. All right. So do you see that French	13:39	22		13:41
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1	A. 52?	13:41	1	A. I think so, but -- yeah. I just don't	13:44
2	Q. Um-hum. We're now into December 3rd.	13:41	2	remember.	13:44
3	A. Yes.	13:41	3	Q. By the way, do people drink alcohol when	13:44
4	Q. Do you see that you are being sent by	13:41	4	meals were served when they met?	13:44
5	Ms. Wallop, it looks like, a Hotel Washington	13:42	5	A. Sometimes they do.	13:44
6	property?	13:42	6	MR. GAVENMAN: Objection, form.	13:44
7	A. Um-hum.	13:42	7	THE WITNESS: Sometimes they don't. Steve, I	13:44
8	Q. Do you remember discussing that	13:42	8	think Steve didn't want to drink.	13:44
9	property?	13:42	9	BY MR. GREIM:	13:44
10	A. No.	13:42	10	Q. Forget about -- I'm sorry. I don't mean	13:44
11	Q. All right.	13:42	11	about Steve Bannon. I mean --	13:45
12	A. There's just so many properties being	13:42	12	A. In general?	13:45
13	discussed.	13:42	13	Q. -- when Strategic Vision met with Mr.	13:45
14	Q. Okay. Do you remember at this time -- I	13:42	14	Guo.	13:45
15	know there's not a lot of detail in these texts, but	13:43	15	MR. GAVENMAN: Objection.	13:45
16	do you remember whether the idea of a research	13:43	16	THE WITNESS: I think I remember there was	13:45
17	project had begun to be discussed by early December?	13:43	17	served alcohol, wine.	13:45
18	A. I don't think so, not in this meeting.	13:43	18	BY MR. GREIM:	13:45
19	Q. Okay.	13:43	19	Q. Okay. Did Mr. Guo have alcohol in these	13:45
20	A. Because we just set up a preliminary	13:43	20	meetings?	13:45
21	meeting, first meeting.	13:43	21	MR. GAVENMAN: Objection.	13:45
22	Q. Okay. And did it appear to you based on	13:43	22	THE WITNESS: He had some.	13:45
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1	the earlier text that maybe the very initial meeting,	13:43	1	BY MR. GREIM:	13:45
2	at least involving you and Strategic Vision, would	13:43	2	Q. What do you remember being discussed at	13:45
3	have been around Thanksgiving, in late November?	13:43	3	the very first meeting?	13:45
4	A. Yeah. About that time, yeah. I just	13:43	4	A. Very little. I think it was more around	13:45
5	don't know exactly. I would say -- did I mention	13:43	5	like the projects here, the vision stuff.	13:45
6	here 17, that Bannon meeting? That's the date they	13:43	6	Q. If you could skip to page 1854.	13:45
7	first met, I think.	13:43	7	A. 54?	13:45
8	Remember here, where it says Bannon had a	13:43	8	Q. Yeah. Actually, it's a few pages back	13:45
9	meeting at 11:30, that pushed back to one o'clock?	13:43	9	from where we were. I'm just trying to pin down	13:45
10	Q. Oh, right.	13:44	10	other dates of meetings.	13:45
11	A. So that day should be their first	13:44	11	A. Okay.	13:45
12	meeting.	13:44	12	Q. And it looks like there's going to be a	13:45
13	Q. I see. So does it look to you like that	13:44	13	meeting that day in New York City.	13:46
14	was November 20th?	13:44	14	A. On December 9?	13:46
15	A. Yes. So that's the first meeting they	13:44	15	Q. Correct.	13:46
16	actually met in person.	13:44	16	A. Um-hum.	13:46
17	Q. And you were there for that meeting?	13:44	17	Q. So do you believe -- this is clearly the	13:46
18	A. Yes. I was there with Steve Bannon and	13:44	18	second meeting, maybe the third meeting. Do you	13:46
19	then with them.	13:44	19	recall?	13:46
20	Q. Then after Bannon left, they came in?	13:44	20	MR. GREIM: Objection.	13:46
21	A. Yes.	13:44	21	THE WITNESS: That, I don't remember exactly.	13:46
22	Q. Was a meal served?	13:44	22	The first, this is definitely not the first, but I	13:46
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1	don't know if it's the second or third or fourth.	13:46	1	Q. Okay. So you don't remember checking	13:49
2	That, I'm not sure.	13:46	2	names, checking other contacts that she provided to	13:49
3	BY MR. GREIM:	13:46	3	Mr. Guo?	13:49
4	Q. By the way, does Ms. Wallop tend to use	13:46	4	A. No.	13:49
5	emoticons in her text?	13:46	5	Q. You don't?	13:49
6	A. Say that again.	13:46	6	A. No.	13:49
7	Q. Does Ms. Wallop tend to use emoticons in	13:46	7	Q. Do you know if Mr. Guo, if he checked	13:49
8	her texts?	13:46	8	the names?	13:49
9	A. Emoticons is like an emoji?	13:46	9	A. I have no idea.	13:49
10	Q. Emojis, yes.	13:46	10	Q. But does this indicate to you that as of	13:49
11	Emoticons, is that even a word? I think I	13:46	11	mid-December, the parties are still very much in	13:49
12	meant emojis. I don't even know what an emoticon is.	13:46	12	discussions?	13:49
13	A. Yeah.	13:46	13	A. Correct.	13:49
14	Q. Okay. If you see -- now let's go ahead	13:46	14	Q. Okay.	13:49
15	now and turn to 1858.	13:47	15	MR. GRENDI: For the record, just wait for	13:49
16	A. 58.	13:47	16	him to finish the question.	13:49
17	Q. And December 16th, there's the long	13:47	17	THE WITNESS: Okay.	13:49
18	series of texts that runs from the 16th to the 17th.	13:47	18	BY MR. GREIM:	13:50
19	You're advising that you landed back from a trip and	13:47	19	Q. On the next page, in white, you respond	13:50
20	there's a -- do you see in green? Is that commentary	13:47	20	to this text from Ms. Wallop. She asked how your day	13:50
21	from Ms. Wallop?	13:47	21	went and you say "not good".	13:50
22	A. Yeah.	13:47	22	A. Yes.	13:50
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1	Q. Okay. Let's skip ahead. Do you see on	13:47	1	Q. What -- I don't understand. What is --	13:50
2	the next page -- this is now 1859 -- at the top, Ms.	13:47	2	what are you talking about in that text, if you can	13:50
3	Wallop says: "By the way, when your M asked for	13:47	3	recall?	13:50
4	names elsewhere, I gave him a mini list, not the real	13:48	4	A. Yeah. I didn't know exactly what was --	13:50
5	list."	13:48	5	I think I had a fight with Steve Bannon, but I didn't	13:50
6	A. We're on 58?	13:48	6	know -- I didn't remember exactly what it was about.	13:50
7	Q. I'm sorry. We're on 59 now. We moved,	13:48	7	Q. Okay. Let's continue on with the string	13:50
8	the same text.	13:48	8	here. You see now, moving into page 1861 from 1860,	13:50
9	A. "By the way". Okay. Yeah.	13:48	9	we are now under the heading December 18, 2017 and	13:51
10	[Witness peruses exhibit.]	13:48	10	Ms. Wallop says: "Safe journey back, please."	13:51
11	BY MR. GREIM:	13:48	11	And you respond: "Great meeting with our	13:51
12	Q. Do you know whether you or Mr. Guo ever	13:48	12	friend. He is coming in two weeks to Washington."	13:51
13	followed up to check with any of these contacts?	13:48	13	Do you see that?	13:51
14	MR. GAVENMAN: Objection, form.	13:48	14	A. Yes.	13:51
15	THE WITNESS: I have no idea.	13:48	15	Q. Do you know who you were referring to	13:51
16	[Interruption.]	13:48	16	there?	13:51
17	BY MR. GREIM:	13:48	17	A. I think it's, perhaps, Miles. I'm just	13:51
18	Q. My question was -- well, first of all,	13:49	18	speculating. Maybe he came to Washington to look at	13:51
19	let's back up.	13:49	19	houses.	13:51
20	Do you remember getting a list of references	13:49	20	Q. Okay. Did he come to Washington at some	13:51
21	from French Wallop?	13:49	21	point to look at houses?	13:51
22	A. No.	13:49	22	A. I think he did, yes. At least I	13:51
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1	remember once.	13:51	1	A. Yes.	13:54
2	Q. Okay. It looks like on the 19th, the	13:51	2	Q. French Wallop says: "Hi there. Were	13:54
3	discussion continues here. She says: "Just checked	13:52	3	you able to set a time to visit New York? I know you	13:54
4	with M and after three is fine for him as well."	13:52	4	will let us know as the conversation unfolds."	13:54
5	On the 20th, she checks again. Do you recall	13:52	5	And then if you continue to page 1864, there's	13:54
6	having another meeting, setting up another meeting	13:52	6	your response. You say: "Not yet. He is	13:54
7	with Mr. Guo and Wallop and Waller? If you need to	13:52	7	incommunicado."	13:54
8	page forward or backward in this to help yourself,	13:52	8	Then you say: "Our Japan friend arrives on	13:54
9	please do.	13:52	9	the 2nd."	13:54
10	A. Page 4? Oh. I think that trip, most	13:52	10	Do you see that?	13:55
11	likely, was looking for real estate in Washington.	13:52	11	A. Yes.	13:55
12	Q. Let's move to December 21.	13:53	12	Q. So was there a time in mid-December when	13:55
13	A. 21, okay.	13:53	13	Mr. Guo sort of stopped conferring with you about	13:55
14	Q. There, you say: "Our friend from Tokyo	13:53	14	this matter?	13:55
15	wants to know when is earliest he can come to meet."	13:53	15	MR. GAVENMAN: Objection, form.	13:55
16	A. Wants to know when is the earliest that	13:53	16	MR. GRENDI: Objection.	13:55
17	he can come to meet.	13:53	17	THE WITNESS: I don't think specifically on	13:55
18	Q. Is this referring to Mr. Guo or a	13:53	18	this matter. Just he's not reachable at the time.	13:55
19	different person?	13:53	19	BY MR. GREIM:	13:55
20	A. It's a different person.	13:53	20	Q. Okay. If you go down to December 24th,	13:55
21	Q. So were you working with Strategic	13:53	21	you have another followup to Ms. Wallop. You say:	13:55
22	Vision on a different potential client?	13:53	22	"I talked with him and he says he wants to do it, but	13:55
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1	A. Yes.	13:53	1	would like to put a clause in the contract which says	13:55
2	Q. And might that have been the person that	13:53	2	if you failed to provide the deliverables as defined	13:55
3	you're referring to back on the previous page, 1862?	13:53	3	in the scope, you should return the deposit. What do	13:55
4	A. 1862?	13:53	4	you think?"	13:55
5	MR. GRENDI: Objection.	13:53	5	Do you see that?	13:55
6	MR. GAVENMAN: Objection.	13:53	6	A. Yes.	13:55
7	BY MR. GREIM:	13:53	7	Q. Now, were you conveying a message from	13:55
8	Q. I'm sorry. 1861.	13:53	8	Mr. Guo there?	13:55
9	A. Oh, yeah. It could be that person. So	13:53	9	A. Yes.	13:55
10	yeah.	13:53	10	Q. And so by December 24th, were	13:55
11	Q. It could have been the Tokyo person?	13:54	11	discussions far enough along that you had already	13:55
12	A. It could have been the Tokyo person, not	13:54	12	begun discussing the actual research project at	13:55
13	Miles. It's just very confusing. Yeah.	13:54	13	issue?	13:55
14	Q. So throughout this string, are you kind	13:54	14	A. Correct.	13:55
15	of talking about both matters at once?	13:54	15	Q. Okay. Then if you go on, you can see	13:56
16	A. Yes.	13:54	16	Ms. Wallop's response actually consumes the rest of	13:56
17	Q. The Guo and the Tokyo matter?	13:54	17	1864 through 1866. If you could, could you take a	13:56
18	A. Yes. They are all mixed.	13:54	18	second to review that, sir.	13:56
19	Q. Let's keep going now.	13:54	19	A. Um-hum.	13:56
20	A. Yeah.	13:54	20	[Witness peruses exhibit.]	13:56
21	Q. If you could go to the bottom of 1863,	13:54	21	THE WITNESS: Yeah.	13:56
22	December 22, 2017.	13:54	22	BY MR. GREIM:	13:57
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1	Q. Okay. Do you recall this conversation?	13:57	1	my understanding is he doesn't want me to sign it.	13:59
2	A. Yes. Now, I remember, yes.	13:57	2	Q. Guo does not want you to sign it?	13:59
3	Q. And you recall that Ms. Wallop did not	13:57	3	A. No. He does not.	13:59
4	want to agree to return of the deposit. Correct?	13:57	4	Q. Let me back up for a second here before	13:59
5	A. Um-hum.	13:57	5	we go further.	13:59
6	Q. You also see she references that you,	13:57	6	A. Yeah.	13:59
7	yourself, would be on the hook, because as of this	13:57	7	Q. We can stop looking at those texts for a	13:59
8	time, she understood that you were going to sign the	13:57	8	second.	13:59
9	contract. Do you see that part?	13:57	9	A. That's okay.	13:59
10	MR. GRENDI: Objection.	13:57	10	Q. What was your role here? Did you see	13:59
11	THE WITNESS: "We will have entered -- which	13:57	11	yourself as an intermediary between the two sides or	13:59
12	part?	13:58	12	as a representative of Guo?	13:59
13	BY MR. GREIM:	13:58	13	A. I think I'm a person to facilitate this	13:59
14	Q. Really, it's sort of at the bottom of	13:58	14	project. I am friend on both sides. I have no	14:00
15	1865 into 1866. Do you see it says -- at the very	13:58	15	financial interest in there.	14:00
16	bottom of 65, it says: "Since he wants you to sign."	13:58	16	My entire thing is driven by the political	14:00
17	A. Yeah.	13:58	17	agenda. So I just want to get the things done, you	14:00
18	Q. "And, therefore, be responsible for	13:58	18	know, achieve what we said we're going to do. That's	14:00
19	payments, that is also very complex and unfair to	13:58	19	it.	14:00
20	you."	13:58	20	Q. By the way, during this period, did Guo	14:00
21	A. Right. What's the question?	13:58	21	approach you and ask you to work for him full time?	14:00
22	Q. Well, do you recall that at some point,	13:58	22	MR. GAVENMAN: Objection to form.	14:00
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1	you were going to be the person to sign the	13:58	1	THE WITNESS: He did. I don't know when.	14:00
2	agreement?	13:58	2	BY MR. GREIM:	14:00
3	A. It wasn't that clear at the time who's	13:58	3	Q. And what was your response?	14:00
4	going to sign, because, obviously, I didn't want to	13:58	4	A. I thought I said I have to think about	14:00
5	get in the middle. That was my intention from the	13:58	5	it, but it's probably, I think way before this,	14:00
6	very beginning.	13:58	6	before the project.	14:00
7	Q. Well, where did the idea of you signing	13:58	7	Q. You don't recall telling Mr. Waller or	14:00
8	come from? Was it suggested by someone?	13:58	8	Ms. Wallop right around the time of the project that	14:01
9	A. I think French wants me to sign that as	13:58	9	Mr. Guo had made the suggestion to you and you were	14:01
10	go-between so I can communicate better with them and	13:58	10	considering it?	14:01
11	with Miles. That's my recollection.	13:59	11	A. I think --	14:01
12	Q. Okay. Now, why wouldn't Guo just sign	13:59	12	MR. GAVENMAN: Objection to form.	14:01
13	it himself?	13:59	13	THE WITNESS: I didn't remember if I	14:01
14	A. That, I don't know.	13:59	14	mentioned it. I probably did, but I didn't recall	14:01
15	Q. Did Guo not want to sign it himself?	13:59	15	the time and the contents -- the context.	14:01
16	MR. GAVENMAN: Objection.	13:59	16	BY MR. GREIM:	14:01
17	MR. GRENDI: Objection.	13:59	17	Q. Did there come a time when you	14:01
18	THE WITNESS: I have no idea.	13:59	18	ultimately told Mr. Guo that you wouldn't do it?	14:01
19	BY MR. GREIM:	13:59	19	MR. GAVENMAN: Objection to form.	14:01
20	Q. Well, did you discuss it with him?	13:59	20	THE WITNESS: I never made a specific -- we	14:01
21	A. No. We hadn't got -- you know, who is	13:59	21	just leave it at that.	14:01
22	going to sign, I think we have not got that far, but	13:59	22	BY MR. GREIM:	14:01
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1	Q. Well, after this time, did he ever come	14:01	1	officials, Wang Qishan, nephew -- not nephew --	14:03
2	back to you again and say he would like you to work	14:01	2	niece's E-mail account or bank account -- I forgot --	14:04
3	for him exclusively?	14:01	3	something to that effect. Yeah.	14:04
4	A. What do you mean, after this?	14:01	4	Q. And did they represent to you that they	14:04
5	Q. Well, let's say after December of 2017.	14:01	5	had done anything illegal?	14:04
6	A. 2017? I think we haven't discussed	14:01	6	A. Well, first of all, I cannot verify that	14:04
7	since. I didn't see anything at all. I didn't	14:02	7	is the real bank account or information. I just saw	14:04
8	respond, confirm or deny or reject. He never	14:02	8	the screen shot and there's a -- you know, it showed	14:04
9	mentioned it again.	14:02	9	the person's name and stuff, and so I didn't, you	14:04
10	Q. Do you remember a moment when Ms. Wallop	14:02	10	know, register anything of that thought.	14:04
11	called you to come over to her apartment --	14:02	11	Q. Sure. And my question is not what you	14:04
12	A. Yes.	14:02	12	think determined. It's did they represent to you	14:04
13	Q. -- late at night and look at something?	14:02	13	that they had done anything illegal in pulling up the	14:04
14	MR. GAVENMAN: Objection to form.	14:02	14	information?	14:04
15	THE WITNESS: There is some time, I think she	14:02	15	A. I didn't know, because we discussed	14:04
16	called me to come to her house.	14:02	16	about how to do it legally, and I think this was	14:05
17	BY MR. GREIM:	14:02	17	during the project formation of what we needed to be	14:05
18	Q. And what was the purpose of that visit?	14:02	18	done, how to not violate law in this country and go	14:05
19	MR. GAVENMAN: Objection to form.	14:02	19	outside of the country and do stuff that the other	14:05
20	THE WITNESS: I think -- I don't specifically	14:02	20	country might be legally obtained, this information.	14:05
21	remember. It probably has to do with the project.	14:02	21	Q. What impact did that have on you when	14:05
22	BY MR. GREIM:	14:02	22	you saw what they pulled up on the screen?	14:05
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1	Q. Did it have to do with something that	14:02	1	A. I first thought they have the ability,	14:05
2	she said she could find, some research that she could	14:02	2	the capacity, to dig into the information Miles is	14:05
3	find?	14:02	3	looking for, I was looking for, and if it's, you	14:05
4	A. Research she could find?	14:02	4	know, really real. So that was my first impression.	14:05
5	MR. GRENDI: Objection.	14:02	5	So I told Miles they have the capability to	14:06
6	THE WITNESS: We had so many meetings in her	14:02	6	get the information they needed. I mean we needed.	14:06
7	house. So I don't, you know, specifically recall.	14:03	7	Yeah.	14:06
8	You know, mostly, it relate to the research projects.	14:03	8	Q. Now, do you have any reason to think	14:06
9	BY MR. GREIM:	14:03	9	that what they showed you wasn't real?	14:06
10	Q. Okay. Do you recall her asking you to	14:03	10	A. I don't, because it's hard -- with just	14:06
11	come over so she can show you that she was able to	14:03	11	the one screen shot, it's very hard to say this is	14:06
12	get into a certain bank account on her computer?	14:03	12	the real thing.	14:06
13	A. Yes.	14:03	13	Q. Do you remember anything else they told	14:06
14	MR. GAVENMAN: Objection.	14:03	14	you about the screen shot?	14:06
15	BY MR. GREIM:	14:03	15	A. Yeah. They told me they have a team	14:06
16	Q. All right. And did you come over and	14:03	16	that got into the system and the system, you know, we	14:06
17	view it?	14:03	17	have to be very careful with the team outside of this	14:06
18	A. Yes.	14:03	18	country, and they want to be very careful and track	14:06
19	Q. What did you see?	14:03	19	information, because they can have some trigger	14:06
20	A. I saw -- I think Mike showed me that,	14:03	20	mechanisms, a switch that can turn it off, and then	14:06
21	not French, and, actually, it's a screen shot that	14:03	21	we should monitor the accounts rather than extract	14:07
22	shows one of the Chinese Government high-ranking	14:03	22	the information. I think that's the only thing I	14:07
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1	remember.	14:07	1	their own employees?	14:09
2	Q. Did they actually mention that to you	14:07	2	MR. GAVENMAN: Objection.	14:09
3	repeatedly, that it was important to monitor rather	14:07	3	THE WITNESS: I think they didn't	14:09
4	than, simply, breaking into the accounts?	14:07	4	specifically say that's their employees. They just	14:09
5	MR. GRENDI: Objection. You can answer.	14:07	5	hire contract people to do the work. I think that's	14:09
6	THE WITNESS: Yes.	14:07	6	my recollection.	14:09
7	MR. GRENDI: Sorry.	14:07	7	BY MR. GREIM:	14:09
8	THE WITNESS: Yeah. The emphasis was on that	14:07	8	Q. Let's talk now about the 15 names. We	14:09
9	point.	14:07	9	touched on this just a little bit earlier.	14:09
10	BY MR. GREIM:	14:07	10	A. Yeah.	14:09
11	Q. And was that your understanding of what	14:07	11	Q. Do you remember sitting with Mr. Guo --	14:09
12	they were supposed to be doing under the contract?	14:07	12	A. Yeah.	14:10
13	MR. GAVENMAN: Objection.	14:07	13	Q. -- and Ms. Wallop and Mr. Waller and	14:10
14	MR. GRENDI: Objection.	14:07	14	walking through a packet of the 15 names?	14:10
15	THE WITNESS: Under the contract, I think	14:07	15	MR. GAVENMAN: Objection.	14:10
16	there's specifically -- it says specific information	14:07	16	THE WITNESS: I think, yeah. I think -- I	14:10
17	that, you know, they were looking for and they were	14:07	17	don't know if I were there or Yvette, because at the	14:10
18	supposed to deliver, and I think whether always	14:07	18	very beginning, maybe I was there. We talked about a	14:10
19	monitor or not always monitor and extract at one	14:08	19	fish tank of things, and the names, maybe I learned	14:10
20	time, there's no such specification, you know,	14:08	20	later, because at one point, he didn't want me to get	14:10
21	specific provision in there.	14:08	21	involved.	14:10
22	BY MR. GREIM:	14:08	22	So I didn't know the names at the time.	14:10
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1	Q. So, however, your understanding is not	14:08	1	Basically, I'm saying I'm a little confused about	14:10
2	that the contract required them to break into the	14:08	2	whether I was present when the 15 names presented,	14:10
3	accounts. Correct?	14:08	3	but I learned later on. At least I know who they	14:10
4	MR. GRENDI: Objection.	14:08	4	are.	14:10
5	MR. GAVENMAN: Objection.	14:08	5	BY MR. GREIM:	14:10
6	THE WITNESS: Please rephrase.	14:08	6	Q. All right. By the way, when did -- when	14:10
7	BY MR. GREIM:	14:08	7	exactly did Yvette Wang get involved here?	14:11
8	Q. Sure. Your understanding is not that	14:08	8	A. So when they reached -- when we	14:11
9	the contract required them to break into these	14:08	9	basically negotiated on the project, the contract was	14:11
10	accounts, is it?	14:08	10	pretty done, like how much he's going to pay, who --	14:11
11	MR. GRENDI: Objection.	14:08	11	what the chunk, tranche of information they're going	14:11
12	MR. GAVENMAN: Objection.	14:08	12	to provide, and then we solved the deposit issue.	14:11
13	THE WITNESS: Not necessarily, but the	14:08	13	How we solved it, I didn't remember, and at the time,	14:11
14	discussion, during the discussion, the deliverables	14:08	14	the basic foundation is done. So he said, I don't	14:11
15	made it very clear that three types of -- three or	14:08	15	want you to get involved; so you're out.	14:11
16	four types information that the contract is going to	14:08	16	I didn't know what was going on afterwards,	14:11
17	require. That is including the detailed information	14:08	17	how the contract restructured, because there were	14:11
18	of financial statements, bank account, credit cards,	14:09	18	changes afterward. So I have no idea.	14:11
19	all of that.	14:09	19	Q. Do you recall that Mr. Guo walked away	14:11
20	BY MR. GREIM:	14:09	20	from the project, abandoned it, and a company called	14:12
21	Q. Okay. Did French and Mike tell you that	14:09	21	Eastern Profit came in to take his place?	14:12
22	all of the people working on the project would be	14:09	22	MR. GAVENMAN: Objection.	14:12
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1	MR. GRENDI: Objection.	14:12	1	MR. GAVENMAN: Okay.	14:14
2	THE WITNESS: I didn't know it.	14:12	2	BY MR. GREIM:	14:14
3	BY MR. GREIM:	14:12	3	Q. All right. So tell me what do you	14:14
4	Q. Do you believe that happened?	14:12	4	recall about this document?	14:14
5	MR. GAVENMAN: Objection.	14:12	5	A. I remember this is -- I don't remember I	14:14
6	MR. GRENDI: Objection.	14:12	6	saw this in my Miles' place. Probably I saw it	14:14
7	THE WITNESS: I didn't remember or recall how	14:12	7	through French, at French's house, but I'm not, you	14:14
8	he walked out. At some point, he asked me, you know,	14:12	8	know, a hundred percent sure.	14:14
9	you need to step in to manage the project.	14:12	9	Q. Do you remember that this is a document	14:14
10	BY MR. GREIM:	14:12	10	that Mr. Guo showed to Mr. Wallop and -- Mr. Waller	14:15
11	Q. So you were gone and then you were back?	14:12	11	and Ms. Wallop?	14:15
12	A. Yes.	14:12	12	A. Most likely.	14:15
13	[Wang Exhibit No. 12 was	14:12	13	MR. GRENDI: Objection.	14:15
14	identified for the record.]	14:12	14	MR. GAVENMAN: Objection.	14:15
15	BY MR. GREIM:	14:12	15	BY MR. GREIM:	14:15
16	Q. Okay. Let's go to the names. I'm going	14:12	16	Q. And did you know that -- well, do you	14:15
17	to show what we've marked in another deposition as	14:12	17	know where these names came from?	14:15
18	Exhibit 12, and you'll see that this is Wang Exhibit	14:12	18	MR. GAVENMAN: Objection.	14:15
19	12. It starts at SVUS000171 and goes to 258, and if	14:13	19	THE WITNESS: I don't know where it comes	14:15
20	you thumb through, you'll see it follows the same	14:13	20	from, but I know this is probably what Miles wanted	14:15
21	format always. There is a number with someone's	14:13	21	them to look into.	14:15
22	name, and then behind it is some information about	14:13	22	BY MR. GREIM:	14:15
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1	that person, and it goes on for several pages, and	14:13	1	Q. Did you discuss with Mr. Guo which names	14:15
2	then there is a second name and so on.	14:13	2	would be good for the project?	14:15
3	Take a second, if you could, just to study	14:13	3	A. No, not at all. This is entirely his.	14:15
4	this and then I'll ask you a few questions about it.	14:13	4	Q. Do you know who did?	14:15
5	A. Yeah. I'm familiar with this.	14:13	5	A. I have no idea.	14:15
6	Q. Okay.	14:13	6	Q. Do you remember a meeting in Guo's	14:15
7	MR. GRENDI: On the record, has Mr. Han	14:13	7	apartment where he had this stack of names and sort	14:15
8	signed the addendum to the protective order?	14:13	8	of tossed it out on the table to Ms. Wallop and Mr.	14:15
9	MR. GREIM: Oh, no. He hasn't. Okay. Let's	14:13	9	Waller and said this cost him \$250 million?	14:15
10	cover this. So we have a protective order in this	14:13	10	MR. GRENDI: Objection.	14:15
11	case, confidential order, and many of the documents	14:13	11	MR. GAVENMAN: Objection.	14:15
12	that we have here today are marked as confidential,	14:14	12	THE WITNESS: I don't remember that. I think	14:15
13	at least as of right now.	14:14	13	the \$2 million, you know, that phrase, that, I	14:15
14	THE WITNESS: Yeah.	14:14	14	remember vaguely, yeah.	14:16
15	MR. GREIM: So we'll ask you, and I'll work	14:14	15	BY MR. GREIM:	14:16
16	with your attorney on this, to sign an order agreeing	14:14	16	Q. Okay. Let me -- that was a compound	14:16
17	to be bound by the protective order in this case,	14:14	17	question too. So let me ask you do you remember Mr.	14:16
18	which means that you can take things here and, you	14:14	18	Guo claiming that this research had cost him, let's	14:16
19	know, show them around, talk them outside. Now, not	14:14	19	say, over \$200 million just to compile this?	14:16
20	all of this is going to end up remaining	14:14	20	A. \$200 million? I don't remember \$200	14:16
21	confidential, but until we've worked it out with the	14:14	21	million. He exaggerates somewhat, like some certain	14:16
22	judge, that's sort of our status quo.	14:14	22	amount for this research.	14:16
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1	Q. Do you remember telling Ms. Wallop and	14:16	1	A. Wang Qishan, W-A-N-G, Q-I-S-H-A-N.	14:18
2	Mr. Waller that the \$200 hundred was probably an	14:16	2	Q. This is the same person that Bannon had	14:18
3	exaggeration?	14:16	3	met with. Right?	14:18
4	A. I probably did.	14:16	4	A. Yes, and Mu Jen Ju is another person	14:18
5	Q. So did there come a time when you did	14:16	5	that is a Chinese security chief. He's also in here.	14:19
6	study the names and information in this packet?	14:16	6	He persecuted Miles' family.	14:19
7	A. Yeah.	14:16	7	Q. Now, do you know whether Mr. Guo ended	14:19
8	Q. When was that?	14:16	8	up getting research on these individuals from some	14:19
9	A. I don't recall the exact date.	14:16	9	other source other than Strategic Vision?	14:19
10	Q. Do you remember why you would have	14:16	10	MR. GRENDI: Objection.	14:19
11	looked through the names?	14:16	11	MR. GAVENMAN: Objection.	14:19
12	A. Why would he look?	14:16	12	THE WITNESS: That, I don't know.	14:19
13	Q. No. Why you would have?	14:17	13	BY MR. GREIM:	14:19
14	MR. GAVENMAN: Objection.	14:17	14	Q. Do you know whether he shared this	14:19
15	THE WITNESS: I think -- I don't remember	14:17	15	information with any of research group after	14:19
16	exactly how when they first come out. The first time	14:17	16	Strategic Vision?	14:19
17	I look at this name, I don't remember exactly, but I	14:17	17	A. I didn't know that either.	14:19
18	did see the list either in New York or in French's	14:17	18	MR. GAVENMAN: Objection.	14:19
19	house, but I just don't remember exactly where.	14:17	19	BY MR. GREIM:	14:19
20	BY MR. GREIM:	14:17	20	Q. Do you know whether he ever hired a	14:19
21	Q. Okay. Do you remember forming any --	14:17	21	group called ASOG out of Texas?	14:19
22	let me just ask you this: Do you remember having any	14:17	22	A. ASOG? No.	14:19
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1	thoughts about whether some of these names would be	14:17	1	Q. Do you know whether he hired an	14:19
2	good subjects for research?	14:17	2	individual named Adam Craft?	14:19
3	A. I think they're all good subjects for	14:17	3	A. No.	14:19
4	research.	14:17	4	Q. Does that name ring a bell to you?	14:19
5	Q. Why is that?	14:17	5	A. Not at all.	14:19
6	A. Because this is the key group in the	14:17	6	Q. Does the name ASOG sound familiar to	14:19
7	control of China's bank system and investment.	14:17	7	you?	14:19
8	Q. So do you know that that's what all	14:17	8	A. Not at all.	14:20
9	these names have in common?	14:18	9	Q. So what did Mr. Guo tell you about this	14:20
10	A. Yes, except --	14:18	10	list, if anything?	14:20
11	MR. GAVENMAN: Objection.	14:18	11	A. He didn't really discuss this list with	14:20
12	THE WITNESS: -- there's -- huh?	14:18	12	me at all, but when I saw it, I know what he's after.	14:20
13	MR. GAVENMAN: Objection to form. You can	14:18	13	Q. Is some of the same information that's	14:20
14	answer.	14:18	14	in this list already on the internet? Have you seen	14:20
15	THE WITNESS: Except there's also like the	14:18	15	it on there?	14:20
16	former party chief's grandson, but for Wang Qishan's	14:18	16	MR. GRENDI: Objection.	14:20
17	group, may of the names here that were in Wang	14:18	17	MR. GAVENMAN: Objection.	14:20
18	Qishan's group, I think they're all involved in	14:18	18	THE WITNESS: There might be some.	14:20
19	Chinese banging corruption.	14:18	19	BY MR. GREIM:	14:20
20	BY MR. GREIM:	14:18	20	Q. Do you have any understanding about who	14:20
21	Q. What's the name? Could you spell out	14:18	21	actually paid Strategic Vision, if anyone, for the	14:20
22	the name that you're telling us? Wang?	14:18	22	work under this agreement?	14:20
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1	MR. GRENDI: Objection.	14:20	1	A. No.	14:22
2	THE WITNESS: I have no idea.	14:20	2	Q. Why not?	14:22
3	BY MR. GREIM:	14:20	3	A. Because I know she is with him for, you	14:22
4	Q. Do you know if it was Guo himself?	14:20	4	know, 16 years at the time. So he trusted her very	14:22
5	MR. GAVENMAN: Objection.	14:21	5	much.	14:23
6	THE WITNESS: I have no idea.	14:21	6	Q. But why would Mr. Guo tell other people	14:23
7	BY MR. GREIM:	14:21	7	that he did not trust her?	14:23
8	Q. Do you know whether Guo consulted with	14:21	8	MR. GRENDI: Objection.	14:23
9	anyone else in coming up with the names?	14:21	9	MR. GAVENMAN: Objection.	14:23
10	MR. GAVENMAN: Objection.	14:21	10	THE WITNESS: I have no idea.	14:23
11	MR. GRENDI: Objection.	14:21	11	BY MR. GREIM:	14:23
12	THE WITNESS: He might have, but he didn't	14:21	12	Q. Well, do you know why you, once again,	14:23
13	mention that to me.	14:21	13	replaced Yvette Wang later on in the parties'	14:23
14	BY MR. GREIM:	14:21	14	dealings?	14:23
15	Q. Do you know whether Guo planned to share	14:21	15	MR. GRENDI: Objection.	14:23
16	the research results from this agreement with any	14:21	16	MR. GAVENMAN: Objection.	14:23
17	other person?	14:21	17	THE WITNESS: I think he tried to salvage the	14:23
18	MR. GRENDI: Objection.	14:21	18	project. He saw the project falling apart because he	14:23
19	MR. GAVENMAN: Objection, form	14:21	19	didn't get what he is paying for and he thought maybe	14:23
20	THE WITNESS: I didn't know that.	14:21	20	I can better communicate with French and Mike's team	14:23
21	BY MR. GREIM:	14:21	21	and get what he's looking for.	14:23
22	Q. So do you recall, roughly, the date when	14:21	22	BY MR. GREIM:	14:24
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1	-- well, let me back up for a second.	14:22	1	Q. Okay. Do you know whether Strategic	14:24
2	I understand your testimony to be that while	14:22	2	Vision wanted to have you as their point, their main	14:24
3	you were involved with Mr. Guo and Strategic Vision,	14:22	3	point of contact?	14:24
4	some deal was agreed to in principle. Correct?	14:22	4	MR. GAVENMAN: Objection.	14:24
5	A. Yes.	14:22	5	THE WITNESS: Yes.	14:24
6	MR. GRENDI: Objection.	14:22	6	BY MR. GREIM:	14:24
7	BY MR. GREIM:	14:22	7	Q. And did they say why that was?	14:24
8	Q. Then at that point, Yvette Wang came in	14:22	8	MR. GAVENMAN: Objection.	14:24
9	to take over negotiating the details of the contract	14:22	9	THE WITNESS: I think they feel they can	14:24
10	itself?	14:22	10	better communicate with me and also they trust me, I	14:24
11	MR. GAVENMAN: Objection.	14:22	11	think.	14:24
12	MR. GRENDI: Objection.	14:22	12	BY MR. GREIM:	14:24
13	THE WITNESS: Yes.	14:22	13	Q. By the way, did you discuss with	14:24
14	BY MR. GREIM:	14:22	14	Strategic Vision the importance of not using Chinese	14:24
15	Q. Did it -- knowing that Mr. Guo had been	14:22	15	entities as either the contracting parties or the	14:24
16	concerned about Ms. Wang earlier, did it surprise you	14:22	16	funding parties for the contract?	14:24
17	that she was brought in to negotiate the contract?	14:22	17	MR. GAVENMAN: Objection.	14:24
18	MR. GRENDI: Objection.	14:22	18	MR. GRENDI: Objection.	14:24
19	MR. GAVENMAN: Objection.	14:22	19	THE WITNESS: I didn't remember specifically	14:25
20	THE WITNESS: No.	14:22	20	that suggestion.	14:25
21	BY MR. GREIM:	14:22	21	BY MR. GREIM:	14:25
22	Q. Did it concern you?	14:22	22	Q. Knowing what you know about the mainland	14:25
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1	and about the Chinese Government --	14:25	1	MR. GAVENMAN: Objection.	14:27
2	A. Right.	14:25	2	THE WITNESS: It's possible, yes. Hong Kong	14:27
3	Q. -- do you agree that it would be prudent	14:25	3	has a different system, but China has a lot of	14:27
4	not to use a Chinese entity or a Chinese bank to pay	14:25	4	difference there.	14:27
5	Strategic Vision under the contract?	14:25	5	BY MR. GREIM:	14:27
6	MR. GRENDI: Objection.	14:25	6	Q. When did you first hear of the entity	14:27
7	MR. GAVENMAN: Objection.	14:25	7	called Eastern Profit?	14:27
8	THE WITNESS: I didn't -- I -- from the very	14:25	8	A. I don't think I ever heard that term	14:27
9	beginning, we want to keep this highly confidential.	14:25	9	until this case, you know, showed up.	14:27
10	Everything we do has to be, you know, like very	14:25	10	Q. Did you know that Mr. Guo's daughter is	14:27
11	cautious, and whether I made that specific	14:25	11	the sole shareholder and director of Eastern Profit?	14:27
12	suggestion, I don't remember, but if I did, it must	14:25	12	MR. GRENDI: Objection.	14:27
13	be based on that principle.	14:25	13	MR. GAVENMAN: Objection.	14:27
14	BY MR. GREIM:	14:25	14	THE WITNESS: No.	14:27
15	Q. And that would be common sense, wouldn't	14:25	15	BY MR. GREIM:	14:27
16	it?	14:25	16	Q. Do you know whether Mr. Guo typically	14:27
17	MR. GRENDI: Objection.	14:25	17	has his children hold companies that he uses for his	14:27
18	MR. GAVENMAN: Objection.	14:25	18	projects?	14:27
19	THE WITNESS: It is not necessarily Chinese	14:25	19	A. I didn't.	14:28
20	company. I think it's how confidential, how	14:25	20	MR. GRENDI: Objection.	14:28
21	trustworthy they are, not the entities, from where.	14:26	21	MR. GAVENMAN: Objection.	14:28
22	It's the discrete nature of the entity that matters.	14:26	22	THE WITNESS: I didn't know.	14:28
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1	BY MR. GREIM:	14:26	1	BY MR. GREIM:	14:28
2	Q. Well, what about the ability of Chinese	14:26	2	Q. Did you always understand that	14:28
3	officials to follow the wire from, you know, a	14:26	3	regardless of who signed the contract that that	14:28
4	Chinese account directly to Strategic Vision?	14:26	4	person or entity would be reporting to Mr. Guo?	14:28
5	MR. GRENDI: Objection.	14:26	5	MR. GRENDI: Objection.	14:28
6	MR. GAVENMAN: Objection.	14:26	6	MR. GAVENMAN: Objection to form.	14:28
7	THE WITNESS: Well, yeah. It's definitely	14:26	7	THE WITNESS: Yes.	14:28
8	easier to track if it's a Chinese company based in	14:26	8	BY MR. GREIM:	14:28
9	China.	14:26	9	Q. Have you ever heard that Hansheng Wang	14:28
10	BY MR. GREIM:	14:26	10	was actually in charge of Eastern Profit?	14:28
11	Q. What about an entity based in Hong Kong?	14:26	11	A. I didn't know that. I thought you said	14:28
12	MR. GAVENMAN: Objection to form.	14:26	12	his daughter.	14:28
13	MR. GRENDI: Objection.	14:26	13	Q. Would it surprise to hear that in this	14:28
14	MR. GAVENMAN: I'm not sure what that	14:26	14	case, Eastern Profit claims that its principal is	14:28
15	question even is. Can you rephrase that question?	14:26	15	Hansheng Wang?	14:28
16	THE WITNESS: Yes.	14:27	16	MR. GAVENMAN: Objection, form.	14:28
17	BY MR. GREIM:	14:27	17	THE WITNESS: I have no idea.	14:28
18	Q. Did you understand it?	14:27	18	BY MR. GREIM:	14:28
19	A. Maybe you can rephrase.	14:27	19	Q. Did you ever talk to Hansheng Wang about	14:28
20	Q. Is it also easier to track if the money	14:27	20	this project at all?	14:29
21	comes from an entity based in Hong Kong?	14:27	21	A. No.	14:29
22	MR. GRENDI: Objection.	14:27	22	Q. Would it surprise if Hansheng Wang was	14:29
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<p>1 in charge of a research project like for this for Mr. 14:29</p> <p>2 Guo? 14:29</p> <p>3 MR. GRENDI: Objection. 14:29</p> <p>4 MR. GAVENMAN: Objection, form. 14:29</p> <p>5 THE WITNESS: As I said, nothing surprises 14:29</p> <p>6 me. 14:29</p> <p>7 BY MR. GREIM: 14:29</p> <p>8 Q. Have you ever heard of an entity called 14:29</p> <p>9 Celestial Tide Holdings? 14:29</p> <p>10 A. Never. 14:29</p> <p>11 Q. Do you recall that after Yvette Wang 14:29</p> <p>12 came in to finalize the contract with Strategic 14:30</p> <p>13 Vision that new disputes erupted? 14:30</p> <p>14 MR. GRENDI: Objection. 14:30</p> <p>15 MR. GAVENMAN: Objection. 14:30</p> <p>16 THE WITNESS: I didn't. If I did, maybe from 14:30</p> <p>17 French, not from Miles or Yvette. 14:30</p> <p>18 BY MR. GREIM: 14:30</p> <p>19 Q. Okay. If you look on December 30th, 14:30</p> <p>20 this is on page 1867 of Han Exhibit 10. 14:30</p> <p>21 A. 67? 14:30</p> <p>22 Q. Um-hum. 14:30</p> <p style="text-align: right;">Page 186</p>	<p>1 Q. And then if you keep going -- I think 14:31</p> <p>2 it's still the same thread -- you'll go to page 1869. 14:31</p> <p>3 You'll see that toward the top, she says: "Also on 14:31</p> <p>4 other fav subject, Y mentioned on Wed she needs to 14:32</p> <p>5 get back to NY to collect her bonus for the year. So 14:32</p> <p>6 she would be excited that NY would be glad that we 14:32</p> <p>7 had an agreement finally." 14:32</p> <p>8 Does that appear to be a reference to Yvette 14:32</p> <p>9 Wang? 14:32</p> <p>10 A. Correct. 14:32</p> <p>11 MR. GAVENMAN: Objection. 14:32</p> <p>12 MR. GRENDI: Objection. 14:32</p> <p>13 BY MR. GREIM: 14:32</p> <p>14 Q. Does it appear to you that by December 14:32</p> <p>15 30th, Yvette Wang was now negotiating directly with 14:32</p> <p>16 French Wallop? 14:32</p> <p>17 A. Yes. 14:32</p> <p>18 MR. GAVENMAN: Objection. 14:32</p> <p>19 MR. GREIM: All right. Let's go ahead and 14:32</p> <p>20 take a break at that point, because we're about done 14:32</p> <p>21 with the video. 14:32</p> <p>22 VIDEOGRAPHER: This ends Disk No. 2, going 14:32</p> <p style="text-align: right;">Page 188</p>
<p>1 A. There it is. Yeah. 14:30</p> <p>2 Q. You'll see that Ms. Wallop begins that 14:30</p> <p>3 day responding to a question from you about the other 14:30</p> <p>4 matter that you were working on. 14:31</p> <p>5 A. Yes. 14:31</p> <p>6 Q. It looks like you were taking some CLE. 14:31</p> <p>7 A. Yes. 14:31</p> <p>8 Q. And you see at the bottom of that, the 14:31</p> <p>9 first thing she says: "What time on Tuesday? Did 14:31</p> <p>10 you speak with NY?" 14:31</p> <p>11 A. Let me see. 14:31</p> <p>12 Q. It's right before the three emojis. 14:31</p> <p>13 A. Okay. "What time on Tuesday? Did you 14:31</p> <p>14 speak with NY?" 14:31</p> <p>15 Yeah. Yeah. That's New York. It refers to 14:31</p> <p>16 Miles Kwok. 14:31</p> <p>17 Q. Okay. And you'll see that she goes on 14:31</p> <p>18 that morning and sends you some hotel 14:31</p> <p>19 recommendations? 14:31</p> <p>20 A. Yes. 14:31</p> <p>21 Q. And many other things? 14:31</p> <p>22 A. Yes. 14:31</p> <p style="text-align: right;">Page 187</p>	<p>1 off the record. The time is now 2:34 p.m. 14:32</p> <p>2 [Recess.] 14:52</p> <p>3 VIDEOGRAPHER: This begins Disk No. 3 in the 14:52</p> <p>4 video deposition of Lianchao Han. We are back on the 14:52</p> <p>5 record. The time is 2:54 p.m. 14:52</p> <p>6 BY MR. GREIM: 14:52</p> <p>7 Q. Mr. Han, welcome back. 14:52</p> <p>8 A. Thank you. 14:52</p> <p>9 Q. If you could, we left on page 1869, but 14:52</p> <p>10 I've got a question for you -- this is still in 14:53</p> <p>11 Exhibit 10 -- about the pages 1884 through 1903, 14:53</p> <p>12 which is the last page. 14:53</p> <p>13 A. Right. 14:53</p> <p>14 Q. And my question for you is would you 14:53</p> <p>15 agree with me that everything from 1884 to 1903 14:53</p> <p>16 refers to matters other than the Strategic Vision 14:53</p> <p>17 Eastern Profit contract? 14:53</p> <p>18 A. I think most the time, most of it, yes. 14:53</p> <p>19 That's correct, except maybe 86. 14:53</p> <p>20 Q. Oh. 14:53</p> <p>21 A. I think that looks like -- 14:53</p> <p>22 Q. Yeah. 14:53</p> <p style="text-align: right;">Page 189</p>

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1	A. -- about their disputes.	14:53	1	A. Um-hum.	14:56
2	Q. Okay. And that's a text exchange on	14:53	2	Q. Did you have any understanding that	14:56
3	February 26th, it looks like. Right?	14:53	3	Yvette Wang was a project manager on this?	14:56
4	A. Yes.	14:54	4	MR. GAVENMAN: Object to the form.	14:56
5	Q. Okay. All right. Then I guess -- all	14:54	5	MR. GRENDI: Objection.	14:56
6	right. I follow you. I guess on February 28th, on	14:54	6	THE WITNESS: I didn't know until maybe	14:56
7	1887, that is about the lawsuit as well.	14:54	7	later.	14:56
8	A. Correct. I mean the dispute of some	14:54	8	BY MR. GREIM:	14:56
9	sort.	14:54	9	Q. Okay.	14:56
10	Q. Okay. So would you agree with me,	14:54	10	A. Not at that point.	14:56
11	though, that everything else in here is about other	14:54	11	Q. Had you ever heard that title used with	14:56
12	work that you were discussing with Ms. Wallop?	14:54	12	respect to Yvette Wang, that she was a project	14:56
13	A. Correct.	14:54	13	manager?	14:56
14	Q. Did any of those dealings come to	14:54	14	A. I didn't know. I didn't, no.	14:56
15	fruition?	14:54	15	Q. Now you said until maybe later. Was	14:56
16	A. No.	14:54	16	there some point where you did learn that she was	14:56
17	Q. Let me ask you -- let's go back to 1869.	14:54	17	project manager?	14:57
18	A. Yeah.	14:54	18	MR. GAVENMAN: Objection to form.	14:57
19	Q. And I want you to focus on after the	14:54	19	MR. GRENDI: Objection.	14:57
20	three question marks that end a sentence somewhere	14:54	20	THE WITNESS: I don't think they ever used	14:57
21	about in the middle or so.	14:55	21	the project manager, but she is in charge of the	14:57
22	A. 89?	14:55	22	project.	14:57
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1	Q. On 1869.	14:55	1	BY MR. GREIM:	14:57
2	A. 69?	14:55	2	Q. If you look at page 1879 and go to the	14:57
3	Q. Yeah.	14:55	3	top --	14:57
4	A. Sorry. Okay.	14:55	4	A. Yeah.	14:57
5	Q. Three question marks, and then Ms.	14:55	5	Q. -- you see this is a carryover from the	14:57
6	Wallop says: "I naturally asked tea or water ginger	14:55	6	previous page.	14:57
7	ale, and her comment, quote, no, we need to talk	14:55	7	A. Right.	14:57
8	about agreement. I spoke for two hours with HK and	14:55	8	Q. But Ms. Wallop is sending you a piece	14:57
9	they told me I cannot sign for monthly amount,	14:55	9	about HNA that was in "The Financial Times". Do you	14:57
10	exclamation point, but her boss told her to do it and	14:55	10	see that?	14:58
11	come back with signed doc."	14:55	11	A. Okay.	14:58
12	Did I read that right?	14:55	12	[Witness peruses exhibit.]	14:58
13	A. Um-hum.	14:55	13	THE WITNESS: Okay.	14:58
14	Q. Now, did you ever hear Yvette Wang or	14:55	14	BY MR. GREIM:	14:58
15	Mr. Guo talk about having to check with individuals	14:55	15	Q. And then your response to her is: "I	14:58
16	in Hong Kong?	14:56	16	gave the story to WSJ a week ago. They're too slow,	14:58
17	A. No.	14:56	17	but we have more details."	14:58
18	Q. If you go to page 1871, after the emojis	14:56	18	And then continuing to the next page: "My	14:58
19	toward the top, you'll see: "She said and as she	14:56	19	advice is to focus on what already in place to	14:58
20	kept saying with abundant authority, I am project	14:56	20	harvest and what will be harvested would be harvested	14:58
21	manager. I decide."	14:56	21	in the next batch. Good luck."	14:58
22	Do you see that?	14:56	22	Did I read the right?	14:58
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1	A. Yes.	14:58	1	supposed to touch them, even look into them. I don't	15:01
2	Q. What was your intent -- first of all,	14:58	2	know if that's true or not, but I said my point is	15:01
3	were you talking to her about the Strategic Vision	14:58	3	even if you have five people you can't touch, but	15:01
4	work?	14:58	4	there's so many on the list. At least you need to	15:01
5	MR. GAVENMAN: Objection to form.	14:58	5	produce something substantial that will satisfy Miles	15:01
6	MR. GRENDI: Objection.	14:58	6	and the contractual, you know, obligations and	15:01
7	THE WITNESS: When was this?	14:58	7	satisfy Miles; otherwise, I said we're going to be	15:01
8	Okay. But we have more detail. Okay. Yeah.	14:58	8	trouble. I think that's what I see coming. Miles	15:02
9	I know what -- can you reframe your question, please?	14:59	9	will terminate the contract. There will be lawsuits	15:02
10	BY MR. GREIM:	14:59	10	going on between the two sides, exactly what I said	15:02
11	Q. Sure. Were you speaking with her about	14:59	11	at the time.	15:02
12	the Strategic Vision work on the research?	14:59	12	Q. And that what you were trying to avoid	15:02
13	MR. GRENDI: Objection.	14:59	13	here?	15:02
14	MR. GAVENMAN: Objection, form.	14:59	14	A. Correct.	15:02
15	THE WITNESS: Yeah. It looks like it.	14:59	15	MR. GRENDI: Objection.	15:02
16	BY MR. GREIM:	14:59	16	MR. GREIM: Okay. I'm now going to show you	15:02
17	Q. And what was your advice to her?	14:59	17	what we marked in another deposition as Exhibit 5.	15:02
18	A. I don't remember specifically. It looks	14:59	18	[Wang Exhibit No. 5 was	15:02
19	like my advice is to focus on what's already in place	14:59	19	identified for the record.]	15:02
20	to harvest and what will be harvested in the next	14:59	20	BY MR. GREIM:	15:02
21	batch. Yeah. I think that I advised them to follow	14:59	21	Q. And these are -- this is Wang Exhibit 5,	15:02
22	the schedule of the deliverables, don't deviate from	14:59	22	Bates labeled SVUS000061 to 76. These are a series	15:02
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1	that.	14:59	1	of texts between you and not Ms. Wallop, but,	15:02
2	Q. So let me move on now to 1882 and you'll	14:59	2	instead, with Mr. Waller.	15:02
3	see -- this is probably the last thing we'll get to	15:00	3	A. Um-hum.	15:03
4	in this packet here. You'll see on February 17,	15:00	4	Q. And so the very first thing we see here	15:03
5	2018, you say: "F, I am disappointed with the	15:00	5	is from December 11, 2017, and I think the first	15:03
6	result. Even there are five RP people, but we still	15:00	6	order of business is let's figure out who's dark gray	15:03
7	many left. We didn't get anything. It put me in a	15:00	7	and who's light gray.	15:03
8	very difficult spot. More importantly, it failed to	15:00	8	A. Okay.	15:03
9	advance our agenda. We have to push the teams to	15:00	9	Q. So can you tell so far which one of	15:03
10	produce and we will in trouble."	15:00	10	these two speakers is you?	15:03
11	Then you go and it looks like you discuss	15:00	11	A. I think the light gray, that must be me.	15:03
12	another topic for the end of that.	15:00	12	Q. Okay.	15:03
13	What were you referring to in that first	15:00	13	A. Because mine is short. I type really	15:03
14	paragraph with five RP people?	15:00	14	slow.	15:03
15	A. Yeah. This, if I recall correctly, this	15:00	15	Q. Well, you are definitely a shorter	15:03
16	was Miles put me back in charge, in charge of	15:00	16	texter than most people. You don't use emojis.	15:03
17	managing the project, and I think Mike French and the	15:01	17	A. I don't.	15:03
18	team didn't produce anything of substance. So I said	15:01	18	Q. So is it -- does it appear to you that	15:03
19	I'm really disappointed with the result.	15:01	19	you met with at least Mr. Waller around December 11,	15:03
20	They claimed the difficulty of extracting	15:01	20	2017.	15:04
21	information, because there are five people that is on	15:01	21	A. Yeah. I don't recall the specific date.	15:04
22	the restriction of American Government. You're not	15:01	22	Q. Right.	15:04
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1	A. And I don't know where we met, because	15:04	1	could not provide. I hope your trip is fruitful."	15:06
2	he was -- he didn't show up -- no. I don't remember	15:04	2	Do you see that?	15:06
3	was he in the first meeting with Miles. Probably	15:04	3	A. Um-hum.	15:06
4	not. He was behind. Yeah. I don't recall	15:04	4	Q. And then you say: Great meeting with	15:06
5	specifically the date.	15:04	5	our friend. He is coming in two weeks in	15:06
6	Q. Did you feel that you had a good rapport	15:04	6	Washington."	15:06
7	with Mr. Waller?	15:04	7	Who are you speaking of there?	15:06
8	A. What?	15:04	8	A. I think this is a friend from Tokyo.	15:06
9	Q. Did you feel that you a good rapport	15:04	9	Q. This is Tokyo?	15:06
10	with Mr. Waller?	15:04	10	A. Yeah.	15:06
11	A. Yes.	15:04	11	Q. Is Mr. Waller talking about this	15:06
12	Q. In fact, did you share the same mentor,	15:04	12	particular project or another one? Can you tell?	15:06
13	someone named Bernie?	15:04	13	MR. GAVENMAN: Objection, form.	15:06
14	A. Correct. Yes.	15:04	14	MR. GRENDI: Objection.	15:06
15	Q. And so Bernie had been -- had served	15:04	15	THE WITNESS: 62?	15:06
16	with Chaing Kai-shek or something like that?	15:04	16	BY MR. GREIM:	15:06
17	A. He was hero in anti-Japanese war. He	15:04	17	Q. Um-hum.	15:06
18	was involved in the KMT, the Taiwan Government	15:04	18	A. Another week's time -- I think this is	15:06
19	intelligence.	15:05	19	talking about -- he's talking about Miles' research	15:07
20	Q. I see. So he was a mentor to you, but	15:05	20	project.	15:07
21	also a mentor to Mr. Waller?	15:05	21	Q. Well, were there some things that	15:07
22	A. Correct.	15:05	22	Strategic Vision said that they could not provide and	15:07
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1	Q. But probably not at the same time?	15:05	1	then they say, no, they could?	15:07
2	A. Roughly around the time.	15:05	2	MR. GRENDI: Objection, form.	15:07
3	Q. Oh, around the same time. Okay.	15:05	3	MR. GAVENMAN: Objection.	15:07
4	A. Yes.	15:05	4	THE WITNESS: I don't specifically recall	15:07
5	Q. Sorry.	15:05	5	what they say they cannot provide. I think	15:07
6	Okay. So let's go to the next page. You'll	15:05	6	everything is based on what's in the contract.	15:07
7	see that on December the 14th now, the dark gray is	15:05	7	BY MR. GREIM:	15:07
8	saying: "I had a very productive meeting with a key	15:05	8	Q. Okay.	15:07
9	capabilities person who is ready. I asked him for	15:05	9	A. If they said they can't provide, that's	15:07
10	another week's time to we don't lose his team. He	15:05	10	supposed to be specified in the contract.	15:07
11	agreed."	15:05	11	Q. Let me direct you now to the December	15:07
12	Do you see that?	15:05	12	23rd texts. They go from 64 to 65.	15:07
13	A. Yes.	15:05	13	A. 65.	15:07
14	Q. Do you recall what Mr. Waller is telling	15:05	14	Q. It starts off with Mr. Waller asking	15:07
15	you there, what he's talk about?	15:05	15	you: "Any news?"	15:07
16	A. I don't. No. I don't remember	15:05	16	A. Any news? Yeah. This is, again, I	15:07
17	specifically --	15:06	17	think this is the Tokyo guy.	15:08
18	Q. Okay.	15:06	18	Q. Okay. And then what about your text at	15:08
19	A. -- the content.	15:06	19	6:19 a.m.?	15:08
20	Q. Let's go down a few days later. Mr.	15:06	20	You say -- it looks like Mr. Waller says:	15:08
21	Waller says: "We can now provide the entire menu	15:06	21	"What about the guy we saw last week?"	15:08
22	that the friend requested, including items we said we	15:06	22	And then you respond: "I will ask."	15:08
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<p>1 A. I always correct him and maybe I didn't 15:16</p> <p>2 see, you know, I would accept his offer to work for 15:16</p> <p>3 him. 15:16</p> <p>4 Q. Well, you say you'd always correct him, 15:16</p> <p>5 but in what sense were you disappointed with him? 15:16</p> <p>6 A. I -- let's see. In one sense, he won't 15:16</p> <p>7 listen to me, to my advice. That's the main reason. 15:16</p> <p>8 We have a political agenda, you know, we both agree 15:16</p> <p>9 to push, and I always gave advice, I think sound 15:16</p> <p>10 advice. He just wouldn't listen to me. 15:17</p> <p>11 Q. Is there anyone he does listen to? 15:17</p> <p>12 A. No. 15:17</p> <p>13 MR. GAVENMAN: Objection, form. 15:17</p> <p>14 MR. GRENDI: Objection. 15:17</p> <p>15 BY MR. GREIM: 15:17</p> <p>16 Q. Then you see Mr. Waller responds: "If 15:17</p> <p>17 you aren't part of the deal, I don't want to be 15:17</p> <p>18 either." 15:17</p> <p>19 A. Yes. 15:17</p> <p>20 Q. "Anybody who is friends with Bernie and 15:17</p> <p>21 Judd is my kind of person." 15:17</p> <p>22 Who is Judd? 15:17</p> <p style="text-align: right;">Page 210</p>	<p>1 want to reveal our work to anybody else." 15:18</p> <p>2 Do you see that? 15:18</p> <p>3 A. Yes. 15:18</p> <p>4 Q. Do you remember Strategic Vision 15:18</p> <p>5 generally being concerned about others learning about 15:18</p> <p>6 this project? 15:18</p> <p>7 A. Right. 15:18</p> <p>8 MR. GAVENMAN: Objection. 15:18</p> <p>9 BY MR. GREIM: 15:18</p> <p>10 Q. Do you recall them being concerned that 15:18</p> <p>11 their research teams or research methods might be 15:18</p> <p>12 exposed to others? 15:18</p> <p>13 MR. GAVENMAN: Objection. 15:18</p> <p>14 MR. GRENDI: Objection. 15:18</p> <p>15 THE WITNESS: Yes. 15:18</p> <p>16 BY MR. GREIM: 15:18</p> <p>17 Q. And did you understand that they felt 15:18</p> <p>18 that you were the most trustworthy person on the 15:18</p> <p>19 other side of the contract? 15:18</p> <p>20 MR. GAVENMAN: Objection. 15:18</p> <p>21 MR. GRENDI: Objection. 15:18</p> <p>22 THE WITNESS: Yes. 15:18</p> <p style="text-align: right;">Page 212</p>
<p>1 A. Judd is my boss, a senator from New 15:17</p> <p>2 Hampshire. 15:17</p> <p>3 Q. Oh, okay. Well, then you respond: "He 15:17</p> <p>4 thinks this will protect me." 15:17</p> <p>5 Right? 15:17</p> <p>6 A. Yes. 15:17</p> <p>7 Q. And do you remember Mr. Guo saying that? 15:17</p> <p>8 A. Because -- 15:17</p> <p>9 MR. GAVENMAN: Objection to form. 15:17</p> <p>10 MR. GRENDI: Objection. 15:17</p> <p>11 THE WITNESS: I think this is, you know, like 15:17</p> <p>12 several days, kind of different days, and then he 15:17</p> <p>13 didn't want me to sign. He said, you know, the 15:17</p> <p>14 reason I didn't want you to get involved because I 15:17</p> <p>15 want to protect you. 15:17</p> <p>16 BY MR. GREIM: 15:17</p> <p>17 Q. Then you see -- go to the next page, 70. 15:17</p> <p>18 Mr. Waller says: "Protect you from what? Any 15:18</p> <p>19 attempt to do anything in court will expose 15:18</p> <p>20 everything and that isn't worth a lousy million 15:18</p> <p>21 dollars for either party. Do you see a necessity on 15:18</p> <p>22 your part to have some else as a signer? I don't 15:18</p> <p style="text-align: right;">Page 211</p>	<p>1 BY MR. GREIM: 15:18</p> <p>2 Q. You see, next, Mr. Waller maybe senses 15:18</p> <p>3 something. So he says: "What is your preference?" 15:19</p> <p>4 And your response is that you don't really 15:19</p> <p>5 care; is that right? 15:19</p> <p>6 A. Right. 15:19</p> <p>7 Q. Were you actually willing to sign the 15:19</p> <p>8 contract if you had to? 15:19</p> <p>9 A. Yes. 15:19</p> <p>10 Q. If you had, do you know who would have 15:19</p> <p>11 paid for it? 15:19</p> <p>12 A. I don't. 15:19</p> <p>13 Q. Do you see Mr. Waller say in response: 15:19</p> <p>14 "I don't want some stranger signing it who doesn't 15:19</p> <p>15 know what he's talking about and will jerk us around. 15:19</p> <p>16 We must report to you and only you for quality 15:19</p> <p>17 control." 15:19</p> <p>18 A. Um-hum. 15:19</p> <p>19 Q. Then you thank Mr. Waller for his trust. 15:19</p> <p>20 A. Um-hum. 15:19</p> <p>21 Q. Mr. Han, do you think that there was a 15:19</p> <p>22 misunderstanding between Mr. Guo and Strategic Vision 15:19</p> <p style="text-align: right;">Page 213</p>

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<p>1 Waller's E-mail of concern -- or I'm sorry -- text of 15:24</p> <p>2 concern, which is at SVUS000072, you see he discusses 15:24</p> <p>3 the concerns that we just talk about. 15:24</p> <p>4 A. Yeah. 15:24</p> <p>5 Q. Then you can see your response at 10:20 15:24</p> <p>6 on December 28t: "I appreciate your trust. I think 15:24</p> <p>7 it is important to get him to sign the contract." 15:24</p> <p>8 Are you talking about Mr. Guo? 15:24</p> <p>9 A. Yes. 15:24</p> <p>10 Q. You see we can work on security later. 15:24</p> <p>11 He wants me to work for him exclusively, which I have 15:24</p> <p>12 to think about. 15:24</p> <p>13 A. Correct. 15:24</p> <p>14 Q. So is it something you were still 15:24</p> <p>15 considering on December 28th? 15:24</p> <p>16 MR. GRENDI: Objection. 15:24</p> <p>17 MR. GAVENMAN: Objection. 15:24</p> <p>18 THE WITNESS: Yes. 15:24</p> <p>19 BY MR. GREIM: 15:24</p> <p>20 Q. When did you decide that it was 15:24</p> <p>21 something you really did not want to do? 15:24</p> <p>22 MR. GRENDI: Objection. 15:24</p> <p style="text-align: right;">Page 218</p>	<p>1 A. Yes. 15:26</p> <p>2 Q. Now let me stop you there for a second. 15:26</p> <p>3 Do you see that above that, back on December 28th, 15:26</p> <p>4 you had forecast that Yvette wanted to talk about the 15:26</p> <p>5 deposit? 15:26</p> <p>6 MR. GAVENMAN: Objection. 15:26</p> <p>7 MR. GRENDI: Objection. 15:26</p> <p>8 MR. GAVENMAN: Form. 15:26</p> <p>9 THE WITNESS: Which? 15:26</p> <p>10 BY MR. GREIM: 15:26</p> <p>11 Q. If you look, we're on 73. 15:26</p> <p>12 A. Yeah. 15:26</p> <p>13 Q. If you go right above there, that's on 15:26</p> <p>14 December 30th. Go back to the 28th. 15:26</p> <p>15 You see he asks you, he says: "Okay. Do you 15:26</p> <p>16 think the contract will be signed today?" 15:26</p> <p>17 And then you say: "Don't know. I think he 15:26</p> <p>18 wants to talk about the deposit." 15:26</p> <p>19 A. Right. 15:26</p> <p>20 Q. So does that make you think maybe you 15:26</p> <p>21 were privy to discussions between Yvette and Mr. Guo 15:26</p> <p>22 before she was sent down to sign the contract? 15:26</p> <p style="text-align: right;">Page 220</p>
<p>1 MR. GAVENMAN: Objection. 15:24</p> <p>2 THE WITNESS: I have no idea when. 15:24</p> <p>3 BY MR. GREIM: 15:24</p> <p>4 Q. Even while Yvette Wang was negotiating 15:24</p> <p>5 with Strategic Vision, were you still getting some 15:25</p> <p>6 information about the negotiations? 15:25</p> <p>7 MR. GRENDI: Objection. 15:25</p> <p>8 MR. GAVENMAN: Objection. 15:25</p> <p>9 THE WITNESS: Not from Miles, but from French 15:25</p> <p>10 and Mike a little bit. 15:25</p> <p>11 BY MR. GREIM: 15:25</p> <p>12 Q. Right. 15:25</p> <p>13 A. Whatever they could share. 15:25</p> <p>14 Q. So if you look, for example, at the 15:25</p> <p>15 bottom of SVUS000073, you see Mike reaches out and 15:25</p> <p>16 says "Please call F". Is that French? 15:25</p> <p>17 A. Yes. 15:26</p> <p>18 Q. "We agreed on the deposit. That wasn't 15:26</p> <p>19 a problem. However, today, Y came back with major, 15:26</p> <p>20 reasonable changes to thing that we had agreed in 15:26</p> <p>21 writing on December 12th." 15:26</p> <p>22 Do you see that? 15:26</p> <p style="text-align: right;">Page 219</p>	<p>1 A. Absolutely no. 15:27</p> <p>2 MR. GRENDI: Objection. 15:27</p> <p>3 MR. GAVENMAN: Objection. 15:27</p> <p>4 THE WITNESS: No. 15:27</p> <p>5 BY MR. GREIM: 15:27</p> <p>6 Q. No? 15:27</p> <p>7 A. No. I'm pretty sure about that. 15:27</p> <p>8 Q. Okay. And let's now move to 74. After 15:27</p> <p>9 Mr. Waller raises his concern about changes being 15:27</p> <p>10 proposed by Yvette, you see you respond later that 15:27</p> <p>11 day on the 30th and you say: "I talked with F." 15:27</p> <p>12 That's French. Right? 15:27</p> <p>13 A. Yes. 15:27</p> <p>14 Q. "It's better to wait a couple of days. 15:27</p> <p>15 Miles -- that's Mr. Guo? 15:27</p> <p>16 A. Yes. 15:27</p> <p>17 Q. "Communicated with me a few times today, 15:27</p> <p>18 but did not mention the failure." 15:27</p> <p>19 A. Right. 15:27</p> <p>20 Q. Did you see that? 15:27</p> <p>21 A. Yes. 15:27</p> <p>22 Q. Now, do you think it's possible that Mr. 15:27</p> <p style="text-align: right;">Page 221</p>

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1	Guo didn't know about the interaction between	15:27	1	Q. I guess I'll tell you this. Feel free	15:31
2	Ms. Wang and French?	15:27	2	to look at the agreement if you want to. What I	15:31
3	MR. GAVENMAN: Objection to form.	15:27	3	really wanted to ask is if you could remember having	15:31
4	MR. GRENDI: Objection.	15:27	4	an understanding about it.	15:31
5	THE WITNESS: I have no idea. I don't think	15:27	5	A. About the deposit?	15:31
6	it's possible.	15:27	6	Q. About the deposit.	15:31
7	MR. GREIM: Okay. Now, earlier, I	15:27	7	A. I didn't know the end result of what	15:31
8	represented to you that the agreement was signed on	15:28	8	they put in the signed form.	15:31
9	January 6th. I'm going to show -- we're going to go	15:28	9	Q. Okay. Then what about the contents of	15:31
10	ahead and mark this even though it's been used	15:28	10	the weekly reports; did you have an understanding	15:31
11	before. I'll just mark it again. I'm going to show	15:28	11	about -- if you want to look at the agreement because	15:32
12	you what we're marking as Han Exhibit 11.	15:29	12	you think it will refresh your memory, do it. That's	15:32
13	[Han Exhibit No. 11 was	15:29	13	fine, but I first want to ask you did you have an	15:32
14	marked for identification.]	15:29	14	understanding about what was going to be in those	15:32
15	BY MR. GREIM:	15:29	15	weekly reports?	15:32
16	Q. I'll represent to you that this is the	15:29	16	MR. GRENDI: Objection to the form.	15:32
17	final signed agreement. Could you turn to page 5.	15:29	17	MR. GAVENMAN: Objection.	15:32
18	It's labeled Eastern-000009.	15:29	18	THE WITNESS: I have a rough idea, because I	15:32
19	Can you tell us the name that is signed there	15:29	19	think we discussed during the meeting he wants	15:32
20	for Eastern Profit?	15:29	20	something of substance, not, you know, junk	15:32
21	MR. GRENDI: Objection.	15:29	21	information, and that, I'm pretty sure.	15:32
22	THE WITNESS: It looks like Han G. Wang, but	15:29	22	BY MR. GREIM:	15:32
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1	it's script. It's hard to tell, but it looks like --	15:29	1	Q. Do you recall, though, the idea that	15:32
2	it's hard to tell, but maybe it's Han.	15:29	2	there would be a ramp-up period, as Mr. Waller texted	15:32
3	BY MR. GREIM:	15:30	3	to you --	15:32
4	Q. Does it look like Yanping Wang?	15:30	4	A. Yes.	15:32
5	A. No.	15:30	5	Q. -- in which the reports would not be the	15:32
6	Q. What's the date that you seen underneath	15:30	6	same as the reports that would come later?	15:32
7	it?	15:30	7	MR. GRENDI: Objection to form.	15:32
8	A. January 6th.	15:30	8	MR. GAVENMAN: Objection.	15:32
9	Q. Did you understand whether the deposit	15:30	9	THE WITNESS: He mentioned that to me. I	15:32
10	would be refundable?	15:30	10	also expressed my concern, those types, because the	15:33
11	MR. GAVENMAN: Objection, form.	15:31	11	assignments, the target is very clear. So there's no	15:33
12	MR. GRENDI: Objection.	15:31	12	point going around and around for those information	15:33
13	THE WITNESS: I don't know. Where is it in	15:31	13	that the client already has. I made that point so	15:33
14	the paper, in the document?	15:31	14	many times in the past.	15:33
15	BY MR. GREIM:	15:31	15	BY MR. GREIM:	15:33
16	Q. If you see on page 5, under Payment	15:31	16	Q. Do you recall after an initial meeting	15:33
17	Terms --	15:31	17	that the start date of the contract was postponed?	15:33
18	A. Yeah.	15:31	18	A. Say that again.	15:33
19	Q. -- that's the reference that I see, but	15:31	19	Q. Do you recall that after an initial	15:33
20	I don't want to suggest to you an answer.	15:31	20	meeting that the start date of the contract was	15:33
21	[Witness peruses exhibit.]	15:31	21	postponed?	15:33
22	BY MR. GREIM:	15:31	22	A. I was not involved in that. So I don't	15:33
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1	recall specifically. There are some glitches, you	15:34	1	and Rule of Law and perfectly, he mentioned many	15:37
2	know, like something going. I also remember French	15:34	2	times to me that he strongly opposed to CGP's	15:37
3	told me in the middle, you know, the wire transfer	15:34	3	dictatorship.	15:37
4	and Miles tried to stop the second payment.	15:34	4	Q. When did he move from second to the	15:37
5	Q. I'm going to be -- make sure I'm a clear	15:34	5	third phase, overthrow CCP?	15:37
6	on a couple of questions about representations. I	15:34	6	MR. GRENDI: Objection to form.	15:37
7	know we covered these much earlier today, but I want	15:34	7	MR. GAVENMAN: Objection to form.	15:37
8	to make sure I've got them.	15:34	8	THE WITNESS: I don't remember specifically.	15:37
9	A. Yeah.	15:34	9	We can go back and look at the timeline, but I don't	15:37
10	Q. Did Guo represent to Strategic Vision	15:34	10	remember.	15:37
11	that he was a dissident?	15:34	11	BY MR. GREIM:	15:37
12	MR. GAVENMAN: Objection, form.	15:34	12	Q. Did you observe the information that was	15:37
13	MR. GRENDI: Objection to form.	15:34	13	loaded onto hard drives given by Yvette Wang to	15:37
14	THE WITNESS: I don't think he specifically	15:34	14	French Wallop?	15:38
15	said he's a dissident, but I think he made his	15:35	15	MR. GAVENMAN: Objection to form.	15:38
16	intention clear to them that he's anti-CCP. This is	15:35	16	MR. GRENDI: Objection to form.	15:38
17	the agenda. The reason we're doing this is to	15:35	17	THE WITNESS: I think it might be -- Mike	15:38
18	disrupt the regime.	15:35	18	shoot me. I don't specifically remember. Maybe I	15:38
19	BY MR. GREIM:	15:35	19	recall that, but it's all junk, full of junk. I was	15:38
20	Q. And when you say disrupt the regime,	15:35	20	disappointed with that. I expressed my	15:38
21	what do you mean by that?	15:35	21	disappointment to Mike. It doesn't advance our	15:38
22	A. Just expose them to corruption, to the	15:35	22	agenda. It doesn't help the deliverables.	15:38
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1	scandals so that people will see the nature of the	15:35	1	Yes. I think I saw it.	15:38
2	Communist regime and even disturb internal power	15:35	2	BY MR. GREIM:	15:38
3	struggle among the leaders.	15:35	3	Q. I'm sorry. My question was different	15:38
4	Q. Did he say it was his goal to actually	15:35	4	though.	15:38
5	overthrow the Communist Part?	15:35	5	A. Okay. Sorry.	15:38
6	MR. GAVENMAN: Objection to form.	15:35	6	Q. My question was whether you saw the hard	15:38
7	MR. GRENDI: Objection to form.	15:35	7	drives that Yvette Wang gave to French Wallop with	15:38
8	THE WITNESS: That, I didn't remember	15:36	8	the initial information to begin the research?	15:38
9	specifically. I think Miles has been involved from	15:36	9	A. Oh, no. Maybe --	15:38
10	the original -- you know, the beginning of the 19 --	15:36	10	MR. GRENDI: Objection to the form.	15:38
11	2017 to this later stage.	15:36	11	MR. GAVENMAN: Objection to form.	15:38
12	Until now, there's an evolution going on with	15:36	12	THE WITNESS: Maybe French shoot me, but	15:38
13	him. He's political agenda are slight different in	15:36	13	French mentioned that when he installed, there some	15:38
14	each stage.	15:36	14	weird stuff going on.	15:39
15	BY MR. GREIM:	15:36	15	BY MR. GREIM:	15:39
16	Q. What do you mean by that?	15:36	16	Q. Did you -- do you remember hearing that	15:39
17	A. From the very beginning, you know, I	15:36	17	there was Malware in the drives?	15:39
18	think he is trying to protect his family, his	15:36	18	A. That's what French told me.	15:39
19	employees, and his assets, his own life, and revenge.	15:36	19	MR. GAVENMAN: Objection to form.	15:39
20	That's the goals, three goals, he proposed, and that	15:36	20	THE WITNESS: I have not -- yeah.	15:39
21	later evolved into anti-CCP, but still support CGP.	15:36	21	BY MR. GREIM:	15:39
22	Now he's moved along that line to overthrow the CCP	15:37	22	Q. Did you realize that that required	15:39
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1	MR. GRENDI: Objection to the form.	15:42	1	second week, but he wants to see you're able to get	15:44
2	THE WITNESS: Yes.	15:42	2	this information as you said.	15:44
3	BY MR. GREIM:	15:42	3	Q. Do you recall whether Mr. Guo had some	15:44
4	Q. Do you recall that Strategic Vision	15:42	4	event or some specific reason for wanting to have	15:45
5	reported to you that they had found Customs fraud?	15:42	5	information within the first couple of weeks?	15:45
6	MR. GRENDI: Objection to form.	15:42	6	MR. GRENDI: Objection to form.	15:45
7	MR. GAVENMAN: Objection to form.	15:42	7	MR. GAVENMAN: Objection to form.	15:45
8	THE WITNESS: Yes.	15:42	8	THE WITNESS: No. I think he wants to get,	15:45
9	BY MR. GREIM:	15:42	9	you know, his money's worth. I think also -- this is	15:45
10	Q. Do you recall that Strategic Vision	15:42	10	just my speculation, that he planned to have a global	15:45
11	reported to you that they had found possible human	15:42	11	press conference. I don't know if he's planning to	15:45
12	trafficking?	15:42	12	expose it, but he wants to get information so he will	15:45
13	MR. GAVENMAN: Objection to form.	15:42	13	be comfortable when he do this, you know, global	15:45
14	MR. GRENDI: Objection to form.	15:42	14	press release conference.	15:45
15	THE WITNESS: Yes.	15:42	15	BY MR. GREIM:	15:45
16	BY MR. GREIM:	15:42	16	Q. Did he disclose that conference to	15:45
17	Q. And did you report those facts to Mr.	15:42	17	Strategic Vision?	15:45
18	Guo?	15:42	18	MR. GAVENMAN: Objection to form.	15:45
19	A. Yes.	15:42	19	THE WITNESS: I don't know.	15:45
20	Q. What was his response?	15:42	20	MR. GRENDI: Objection to form.	15:45
21	A. He -- I forgot. I cannot recall exactly	15:42	21	THE WITNESS: Not in my presence. I don't	15:45
22	his reaction, but my impression now, I think he	15:43	22	recall that, I should say.	15:46
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1	didn't understand the significance of this	15:43	1	BY MR. GREIM:	15:46
2	information and he's so into whatever is in the	15:43	2	Q. Do you believe that -- or, well, let me	15:46
3	contract, you know, bank statements, how they --	15:43	3	-- I'll strike that. Did Mr. Guo ever end up getting	15:46
4	money transferred, that type of information. That's	15:43	4	research on these 15 individuals and using it for the	15:46
5	just my guess.	15:43	5	purposes that he claimed he would use it?	15:46
6	Q. So did Mr. Guo tell you that he believed	15:43	6	MR. GRENDI: Objection to the form.	15:46
7	that within the first week or two, he would be	15:43	7	MR. GAVENMAN: Objection.	15:46
8	getting actual bank statements for the subjects?	15:43	8	THE WITNESS: Please rephrase that.	15:46
9	A. Say that again.	15:43	9	BY MR. GREIM:	15:46
10	Q. Did Mr. Guo tell you that within the	15:43	10	Q. Sure. Did Mr. Guo ever end up getting	15:46
11	first week or two, he thought he would be getting	15:43	11	information on the 15 individuals and then using it	15:46
12	actual bank statements for the subjects?	15:44	12	for the purposes he claimed he was going to use	15:46
13	A. No. I think he wants to see whatever is	15:44	13	Strategic Vision's research?	15:46
14	in the contract, not just bank accounts. I'm just	15:44	14	MR. GRENDI: Objection to the form.	15:46
15	using that as an example.	15:44	15	MR. GAVENMAN: Objection.	15:46
16	Q. Sure.	15:44	16	THE WITNESS: That's a hypothetical question.	15:46
17	A. Because there are three or four	15:44	17	BY MR. GREIM:	15:46
18	different categories of information. He wants to	15:44	18	Q. Well, no. I wonder it if it actually	15:46
19	see, you know, the progress each time, each month,	15:44	19	happened?	15:46
20	each week that there is a progress on those type of	15:44	20	A. No. It never happened, because the	15:46
21	information. I don't think he expected to get, you	15:44	21	information is not what he's asking for.	15:47
22	know, like good intelligence in the first week or	15:44	22	Q. But did he ever go to somebody else --	15:47
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1	A. I don't know.	15:47	1	we still have many left. I mean here, the many left,	15:49
2	Q. -- and get the research and then go	15:47	2	but we didn't get anything.	15:49
3	expose Chinese Communist leaders?	15:47	3	Q. So when you said we have many left, it's	15:49
4	MR. GRENDI: Objection to form.	15:47	4	your testimony you're referring to people who are not	15:49
5	MR. GAVENMAN: Objection to form.	15:47	5	part of 15 whose names might have appeared?	15:49
6	THE WITNESS: I'm not aware of that.	15:47	6	A. No, no, no. If you read this, 82, page	15:49
7	BY MR. GREIM:	15:47	7	82, I said even there are five RP people, that means	15:49
8	Q. Do you recall Strategic Vision asking	15:47	8	people in this list that's under protection. There	15:49
9	you to ask Guo to provide some non-records-protected	15:47	9	are -- we still have many left. That means many in	15:49
10	names?	15:47	10	this list that left, we can go after them, but I said	15:49
11	MR. GRENDI: Objection to form.	15:47	11	we didn't get anything. I mean they didn't do	15:49
12	THE WITNESS: I don't know that. Say that	15:47	12	anything to collect that information. It put me in a	15:49
13	again. Non-record?	15:47	13	very difficult spot.	15:49
14	BY MR. GREIM:	15:47	14	More importantly, it failed to advance our	15:49
15	Q. Do you recall that Strategic Vision	15:47	15	agenda. So that's what said this project to do, to	15:50
16	asked you to ask Guo to provide some	15:47	16	get information to expose the corruption of Chinese	15:50
17	non-records-protected names?	15:47	17	Communist, you know, high-ranking officials.	15:50
18	MR. GRENDI: Objection to the form.	15:47	18	Q. I guess --	15:50
19	THE WITNESS: I don't remember, but there's	15:47	19	A. That's what I was upset about.	15:50
20	plenty in this list that is not protected.	15:47	20	Q. Right, but I guess my question to you is	15:50
21	BY MR. GREIM:	15:47	21	how do you know they were not gathering that	15:50
22	Q. Do you know that?	15:48	22	information?	15:50
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1	A. Yeah, because they told me they have	15:48	1	A. Because they told me they only found	15:50
2	four or five people that is under, you know, the	15:48	2	five or four. They are not sure how many actually	15:50
3	protection, but there's so many here. Even they said	15:48	3	are in this PR under protection, but if they only	15:50
4	15, but there's plenty, because Miles tried to stack	15:48	4	found two, I mean, or four or five, there's so many	15:50
5	more names into this research project.	15:48	5	here.	15:50
6	Q. So did you tell Strategic Vision that it	15:48	6	Q. Didn't they go and get information on	15:50
7	should just move on and start investigating other	15:48	7	someone named Frank Swen?	15:50
8	members of the family tree?	15:48	8	MR. GRENDI: Objection.	15:50
9	A. Yes. It's in here.	15:48	9	MR. GAVENMAN: Objection to form.	15:50
10	MR. GAVENMAN: Objection to form.	15:48	10	THE WITNESS: But that's not information in	15:50
11	THE WITNESS: I think in the texts made it	15:48	11	the contract. The information is only on surface,	15:50
12	very specific.	15:48	12	some kind of, you know, like use the, you know,	15:50
13	BY MR. GREIM:	15:48	13	Social Security account, maybe some passport issue.	15:50
14	Q. Let's see. Show me where you're	15:48	14	It's not the information. You know, they touched	15:51
15	pointing to.	15:48	15	some things, but not the information, you know, as	15:51
16	A. I don't remember, but it's in here.	15:48	16	specified.	15:51
17	Q. Okay. I would like to go -- because you	15:48	17	BY MR. GREIM:	15:51
18	pointed to your text. I would like to see where you	15:48	18	Q. Let me ask you this: Your text says and	15:51
19	provided that advice. It would have to be --	15:48	19	you've been saying today that only five are records	15:51
20	A. Okay. Let me see. Like, for example,	15:48	20	protected.	15:51
21	in 82, I discuss with French, said I'm disappointed	15:48	21	A. That's what they told me.	15:51
22	with the result. Ever there are five RP people, but	15:49	22	Q. That's -- well, I think you're reading	15:51
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1	MR. GRENDI: Objection to the form.	15:55	1	Q. We're getting too conversational, Mr.	15:57
2	MR. GAVENMAN: Objection.	15:55	2	Han.	15:57
3	THE WITNESS: I don't recall. I think I	15:55	3	A. Yeah.	15:57
4	probably heard from Mike and French, not from Miles.	15:55	4	Q. Let me ask you another question. Have	15:57
5	BY MR. GREIM:	15:56	5	you heard of Robert S. Tucker or Duncan Levin?	15:57
6	Q. When you heard that was happening, what	15:56	6	A. Yes.	15:57
7	did you do?	15:56	7	Q. Have you met them?	15:58
8	A. I don't remember. I was disappointed.	15:56	8	A. I met with Tucker.	15:58
9	I know that I put lots of hope in this project and I	15:56	9	Q. Okay. And was he a member of the	15:58
10	hoped its success. I feel I failed on both sides. I	15:56	10	security team for Guo?	15:58
11	tried to put two sides together, have Miles to pay	15:56	11	A. At the time.	15:58
12	for this, dig up something that we can use to expose	15:56	12	MR. GAVENMAN: Objection to form.	15:58
13	the Communist regime's corruption so that it advances	15:56	13	MR. GRENDI: Objection to form.	15:58
14	our agenda on anti-CCP, but I failed because I	15:56	14	BY MR. GREIM:	15:58
15	unforeseen the difficulties of finding this	15:56	15	Q. Was this in, what, 2017?	15:58
16	information and working together.	15:56	16	A. Yes.	15:58
17	So that's just my assessment.	15:56	17	Q. Do you know if Guo used Mr. Tucker to do	15:58
18	Q. But to be fair, you don't know of Mr.	15:56	18	this research?	15:58
19	Guo being able to do project like this with anyone	15:56	19	A. I didn't.	15:58
20	else, do you?	15:57	20	MR. GAVENMAN: Objection to the form.	15:58
21	MR. GRENDI: Objection.	15:57	21	BY MR. GREIM:	15:58
22	MR. GAVENMAN: Objection to form.	15:57	22	Q. Or research similar to this?	15:58
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1	THE WITNESS: Can you rephrase that?	15:57	1	A. I didn't.	15:58
2	BY MR. GREIM:	15:57	2	Q. Did there come a time when Tucker was no	15:58
3	Q. But to be fair, you don't of Mr. Guo	15:57	3	longer being used as the security person for Guo?	15:58
4	doing a project like this with anyone else, do you?	15:57	4	A. I didn't know when they terminate his	15:58
5	MR. GRENDI: Objection.	15:57	5	thing and I just later learned because they changed	15:58
6	MR. GAVENMAN: Objection to form.	15:57	6	security. I didn't ask why.	15:58
7	THE WITNESS: I don't know if he's doing	15:57	7	Q. Do you know anything about what Mr.	15:58
8	anything or have done anything with other group	15:57	8	Tucker did for Mr. Guo?	15:58
9	whatsoever except this one.	15:57	9	A. I didn't.	15:58
10	BY MR. GREIM:	15:57	10	MR. GRENDI: Objection.	15:58
11	Q. On that point, have you ever heard of	15:57	11	MR. GAVENMAN: Objection.	15:58
12	T&M -- that's the letter T and M --Protection	15:57	12	THE WITNESS: Except one thing.	15:58
13	Resources?	15:57	13	MR. GAVENMAN: You can answer.	15:58
14	A. No. Can you -- who -- is that his	15:57	14	THE WITNESS: I can answer? Okay. Except	15:58
15	security team?	15:57	15	one thing. I had a breakfast with Tucker and he told	15:59
16	Q. At one time, I believe.	15:57	16	me that during the breakfast that one of his	15:59
17	MR. GRENDI: Objection. I mean, who's	15:57	17	Communist -- we suspect a Communist agent approached	15:59
18	testifying? Sorry.	15:57	18	him. We suspect this guy is the smear campaign	15:59
19	MR. GREIM: Yeah. That's right. Let's keep	15:57	19	commander in this country. We know he's very close	15:59
20	it Q&A. I'm sorry.	15:57	20	to CCP, high ranking, and this guy, his name is Bruno	15:59
21	MR. GRENDI: Thanks.	15:57	21	Wu.	15:59
22	BY MR. GREIM:	15:57	22	Bruno Wu approached Tucker, offered him 20	15:59
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1	million cash to switch to espionage on Miles, and	15:59	1	answered.	16:20
2	Tucker asked where you get the cash and he said from	15:59	2	THE WITNESS: I don't remember I saw that.	16:20
3	Jack Ma, Alibaba, and then he said they had this	16:00	3	BY MR. GREIM:	16:20
4	conversation in the open. He videotaped the	16:00	4	Q. Okay. Would you have introduced	16:20
5	conversation.	16:00	5	Strategic Vision to the Japan and Taiwan projects if	16:20
6	BY MR. GREIM:	16:00	6	you thought that Strategic Vision was dishonest?	16:20
7	Q. Tucker did?	16:00	7	MR. GAVENMAN: Objection to form.	16:20
8	A. Tucker did. That's the only thing I	16:00	8	MR. GRENDI: Objection.	16:20
9	remember during the conversation I had with him.	16:00	9	THE WITNESS: I wouldn't.	16:20
10	MR. GREIM: All right. Okay. Let's take a	16:00	10	BY MR. GREIM:	16:20
11	short break.	16:00	11	Q. Okay. Let's see. I didn't ask you this	16:20
12	MR. GRENDI: Yeah.	16:00	12	before: Have you ever met Karin Maestrello?	16:20
13	VIDEOGRAPHER: Going off the record. The	16:00	13	A. Who is that?	16:20
14	time is 4:02 p.m.	16:00	14	Q. Okay. Then I guess -- have you heard	16:20
15	[Recess.]	16:00	15	that name before?	16:21
16	VIDEOGRAPHER: We are back on the record.	16:18	16	A. Carol?	16:21
17	The time is now 4:20 p.m.	16:18	17	Q. Karin Maestrello.	16:21
18	BY MR. GREIM:	16:19	18	A. Karin? Karin? You mean Miles'	16:21
19	Q. Mr. Han, you testified earlier that the	16:19	19	assistant, Karin?	16:21
20	projects being discussed at the end of the packet	16:19	20	Q. Yes.	16:21
21	we've marked as Exhibit 10, that those projects did	16:19	21	A. Yes. I met. The Italian girl?	16:21
22	not come to fruition?	16:19	22	Q. The what?	16:21
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1	MR. GAVENMAN: Objection.	16:19	1	A. Italian girl.	16:21
2	THE WITNESS: With --	16:19	2	Q. Italian girl, that's right.	16:21
3	BY MR. GREIM:	16:19	3	A. Yes. I met her.	16:21
4	Q. With Strategic Vision?	16:19	4	Q. Do you know what she does for Mr. Guo?	16:21
5	A. No.	16:19	5	A. She's just --	16:21
6	Q. And did that include the Taiwan project?	16:19	6	MR. GAVENMAN: Objection to form.	16:21
7	A. Correct. We are still waiting for that	16:19	7	MR. GRENDI: Objection to form.	16:21
8	response.	16:19	8	THE WITNESS: My understanding is like an	16:21
9	Q. Do you recall the contact in Taiwan	16:19	9	assistant, office assistant.	16:21
10	citing the political article as a concern in working	16:19	10	BY MR. GREIM:	16:21
11	with Strategic Vision?	16:19	11	Q. Do you recall that -- do you recall	16:21
12	A. No. What's that? Can you remind me?	16:19	12	hearing that Mr. Guo, himself, told Ms. Wallop and	16:21
13	Q. Well, are you aware of an article in	16:19	13	Mr. Waller that Yvette Wang was still a member of the	16:21
14	"Politico" about -- written about Eastern Profit and	16:19	14	Chinese Communist Party?	16:22
15	Strategic Vision in this case?	16:19	15	A. No. I don't recall that.	16:22
16	A. I saw that article, but that has nothing	16:19	16	Q. Do you recall telling Ms. Wallop and Mr.	16:22
17	to do with the Taiwan project.	16:20	17	Waller that Yvette Wang was still a member of the	16:22
18	Q. Oh. I understand. It doesn't discuss	16:20	18	Chinese Communist Party?	16:22
19	the Taiwan project at all, but do you recall that the	16:20	19	A. I don't. I don't recall that.	16:22
20	contact in the Taiwan project mentioned the	16:20	20	Q. Do you think it's possible and just	16:22
21	"Politico" article?	16:20	21	don't remember?	16:22
22	MR. GAVENMAN: Objection, form, asked and	16:20	22	A. I think it's possible.	16:22
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1	matter?	16:35	1	-- I'll call them fake dissidents, people are	16:37
2	MR. GREIM: Objection, calls for speculation	16:35	2	pretending to be dissidents?	16:37
3	and opinion and also vague.	16:35	3	A. Yes.	16:37
4	THE WITNESS: I think they have a good	16:35	4	Q. And what do those fake dissidents do?	16:37
5	intention at the beginning and want to do the right	16:35	5	What is their purpose?	16:37
6	thing, and yeah. I have no doubt, otherwise, I	16:35	6	A. If we're talking about specifically	16:37
7	wouldn't introduce them to Miles.	16:35	7	related to this project --	16:37
8	BY MR. GRENDI:	16:35	8	Q. Sure.	16:37
9	Q. Do you think they cared about the money?	16:35	9	A. They're a smear campaign against Miles	16:37
10	A. They do care about the money, but they	16:35	10	Kwok. That was number one that those fake dissidents	16:37
11	do also care about the political agenda.	16:35	11	are doing, and in addition to that, there are a lot	16:38
12	Q. What is Hansheng Wang look like?	16:35	12	of people that Miles sued or countersued who are	16:38
13	A. He's a very quiet guy, very reserved,	16:35	13	involved in fake political asylum business and they	16:38
14	never participated in any of our meetings.	16:35	14	are to survive to make money, like fake persons.	16:38
15	Q. Have you ever talked to him?	16:35	15	We have evidence to show they made -- he	16:38
16	A. Occasionally.	16:35	16	helped people to fabricate fake political asylum	16:38
17	Q. If you recall, what did you talk to him	16:35	17	cases, and there are many more. Like another guy, a	16:38
18	about?	16:36	18	lawyer, also does the same thing and then he's also	16:38
19	A. I think it's like what he -- where he	16:36	19	somehow connected with the MSS and the Chinese	16:38
20	come from, where's his native province and what the	16:36	20	Embassy.	16:38
21	family were doing. I think he just come from a poor	16:36	21	There are so many of them. You know, I think	16:38
22	family, like a rural farmer, stuff like that.	16:36	22	you probably need to talk to the FBI to get this	16:38
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1	Q. How many times have you met him?	16:36	1	information.	16:39
2	A. I don't know. I don't remember exactly	16:36	2	Q. So you believe the CCP is employing	16:39
3	how many times, but every time I've been to the	16:36	3	hundreds of fake dissidents, if you know, however	16:39
4	apartment, most of the time he's there.	16:36	4	many you think?	16:39
5	Q. Is he a dissident?	16:36	5	A. I don't know how many. I have no idea	16:39
6	MR. GREIM: Objection, calls for opinion.	16:36	6	how many, but in this particular case against Miles,	16:39
7	THE WITNESS: Well, no. I think he is part	16:36	7	they hired very many to do their dirty work,	16:39
8	of, you know, Miles' team. You know, you can't	16:36	8	basically drag them into this lawsuit. At the	16:39
9	escape that. Everybody becomes a dissident now.	16:36	9	beginning, I think lots of dissidents, whether fake	16:39
10	BY MR GRENDI:	16:37	10	or real, they come to Miles and try to get support,	16:39
11	Q. Anyone who does business with Miles	16:37	11	financial support, from him, and when that failed and	16:39
12	and --	16:37	12	they started fighting over social media, criticized	16:39
13	A. Anyone associated with him, does	16:37	13	Miles, and that caused them anger from Miles' side.	16:39
14	business with him, they will all become a dissident.	16:37	14	So he started suing them, and those dissidents or	16:40
15	Q. And they're putting their lives at risk	16:37	15	activists, so called, they have now resources to do	16:40
16	if they go back to China by doing so?	16:37	16	this and then we saw the money transfer from the	16:40
17	MR. GREIM: Objection, calls for speculation.	16:37	17	Chinese Government. They use one singular law firm	16:40
18	THE WITNESS: Absolutely.	16:37	18	to do -- you know, didn't bother to change their	16:40
19	BY MR. GREIM:	16:37	19	complaints, and then we have some evidence	16:40
20	Q. I'm sorry. What was your --	16:37	20	independently -- it has nothing to do with Miles --	16:40
21	A. Absolutely.	16:37	21	we obtained from people that we know, showing that	16:40
22	Q. Okay. Do you know if the CCP employees	16:37	22	they work closely with the Chinese consulate in New	16:40
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1	York, the embassy here, and money their transferred	16:40	1	Q. Do they ever post fake images?	16:43
2	from different channels to pay for the legal bill.	16:40	2	A. Could be.	16:43
3	Q. Are you familiar with a website called	16:40	3	Q. Fake videos?	16:43
4	Boxun, B-O-X-U-N, I think?	16:41	4	A. That, I'm not expert on that. So I	16:43
5	A. Yes.	16:41	5	can't tell.	16:43
6	Q. And what does that website do?	16:41	6	Q. Would it surprise you if they did?	16:43
7	A. That website used to be a dissident	16:41	7	A. No. I'm not surprised by that.	16:43
8	Chinese language dissident -- you know, it's like a	16:41	8	Q. Are you aware that Google recently took	16:43
9	free press. It's a free platform. Everybody can put	16:41	9	down a number of videos from its platform that were	16:43
10	their stuff in there, but mostly, it's the dissidents	16:41	10	posted by fake dissidents?	16:43
11	who use that website to access information, post	16:41	11	A. Yes.	16:43
12	their grievances or the articles they wrote.	16:41	12	Q. Do you know if any of those videos were	16:43
13	Q. So it's sort of open source; anyone can	16:41	13	critical of Miles Kwok or Guo Wengui?	16:43
14	post on it?	16:41	14	A. I don't know specific. I suspect, yeah.	16:43
15	A. Correct.	16:41	15	There might be some.	16:43
16	Q. Have fake dissidents posted information	16:41	16	Q. Because Guo Wengui is a real dissident.	16:43
17	on that website?	16:41	17	Right?	16:43
18	A. I'm sure there are many Chinese	16:41	18	A. Guo Wengui, yes. I would characterize	16:43
19	Communists, you know, like sui jin. The water army,	16:41	19	him as a real dissident.	16:44
20	that's the term that posts stuff on that website as	16:41	20	Q. And the CCP pretty desperate to get him	16:44
21	well.	16:41	21	back to China and put him in jail?	16:44
22	Q. So you wouldn't necessarily trust	16:41	22	A. Correct.	16:44
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1	anything coming out of Boxun because fake dissidents	16:41	1	Q. In drafting the contract, was there a	16:44
2	post information there?	16:42	2	concern about Mr. Wengui being identified in	16:44
3	A. No. It depends on the information.	16:42	3	connection with the research agreement?	16:44
4	Q. Do you happen know where Exhibit 3 and	16:42	4	A. I think there was, if I recall	16:44
5	Exhibit 3 were posted, where they came from?	16:42	5	correctly.	16:44
6	A. No, I don't. Which one?	16:42	6	Q. I'll take you back to the contract. Do	16:44
7	Q. Three.	16:42	7	you remember if there was a specific schedule in that	16:44
8	A. Okay. Yeah.	16:42	8	agreement concerning when reports were to be	16:44
9	Q. Do you know if Boxun was the uploading	16:42	9	delivered?	16:44
10	entity that put this video out there?	16:42	10	A. Yes. There is.	16:44
11	A. I didn't know that.	16:42	11	Q. Was it -- did it call for reports within	16:44
12	Q. Would you trust it if it came from	16:42	12	the first week, in the first month of the contract?	16:45
13	Boxun?	16:42	13	A. Yeah. I think there is a specific	16:45
14	A. It depends on the content. I think it	16:42	14	requirement on the first week. I think it's just	16:45
15	depends on the information.	16:42	15	trying to show the progress, we're on the right	16:45
16	Q. Well, let me ask you this.	16:42	16	track.	16:45
17	A. Not necessarily whether it showed on the	16:42	17	Q. Well, let's look at the agreement. What	16:45
18	platform.	16:42	18	number is that? It's number --	16:45
19	Q. Have fake dissidents posted false	16:42	19	MR. GAVENMAN: Eleven.	16:45
20	information about other dissidents to disrupt the --	16:42	20	MR. GRENDI: Eleven.	16:45
21	I'll call it the effort to damage the CCP?	16:42	21	MR. GREIM: Let me just say while we're	16:45
22	A. Yeah. There are some.	16:42	22	pulling it up, the witness was instructed not to	16:45
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1	answer previously about the agreement on the ground	16:45	1	reports per individual subject to the client within a	16:47
2	it was calling for a legal conclusion. So I would	16:45	2	specified timeframe as well as all relevant	16:47
3	hope we'd have consistence.	16:45	3	supporting data."	16:47
4	MR. GAVENMAN: It depends on what the	16:45	4	Do you see that?	16:47
5	question is.	16:45	5	A. Yes.	16:47
6	MR. GRENDI: I wasn't asking about a legal	16:45	6	Q. I'll ask you again did Strategic Vision	16:47
7	opinion on it.	16:45	7	deliver weekly reports within the first month of the	16:47
8	Oh, there's my copy. I'm sorry.	16:45	8	agreement?	16:47
9	BY MR. GRENDI:	16:45	9	A. No.	16:47
10	Q. Just looking at the second page, it says	16:45	10	Q. If you look further down the page, it	16:47
11	the contractor will produce progress reports on this	16:46	11	says: "The contractor will produce social media	16:47
12	--	16:46	12	research per individual subject to the client on a	16:47
13	A. Where is that?	16:46	13	weekly basis for the first month and on a monthly	16:47
14	Q. Oh, I'm sorry. The first full paragraph	16:46	14	basis thereafter except under circumstances that	16:47
15	on the second page.	16:46	15	require more frequent reporting, paren, weekly or	16:47
16	A. Okay. Okay. Yes.	16:46	16	fortnightly, as the client directs or irregular	16:48
17	Q. It says: "The contractor will produce a	16:46	17	emergencies that the contractor may discover."	16:48
18	progress report on this financial forensic research	16:46	18	Do you see that?	16:48
19	each week in the first month, one preliminary report	16:46	19	A. Um-hum.	16:48
20	in the first month and one comprehensive historical	16:46	20	Q. Did Strategic Vision deliver weekly	16:48
21	research report within three months."	16:46	21	reports during the first month of the agreement	16:48
22	And then it goes on to talk about update	16:46	22	concerning social media research?	16:48
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1	reports. Do you see that section there?	16:46	1	MR. GREIM: Objection, foundation.	16:48
2	A. Yes.	16:46	2	THE WITNESS: No.	16:48
3	Q. Did Strategic Vision deliver financial	16:46	3	BY MR. GRENDI:	16:48
4	forensic research reports each week in the first	16:46	4	Q. And if you look in the middle of the	16:48
5	month?	16:46	5	page there, again, we're on Eastern-000006, the	16:48
6	MR. GREIM: Objection. Counsel has not	16:46	6	middle paragraph says: "The contractor will produce	16:48
7	actually read the portion of the contract that he's	16:46	7	concurrent tracking research per individual subject	16:48
8	purporting to ask about.	16:46	8	to the client on a month basis except in the first	16:48
9	MR. GRENDI: What are you talking about?	16:46	9	month that weekly reports shall be delivered and	16:48
10	THE WITNESS: No.	16:46	10	under circumstances that require more frequent	16:48
11	MR. GRENDI: Would you like me to read the	16:46	11	reporting, paren, weekly or fortnightly, end paren,	16:48
12	full sentence, Mr. Greim? Is that what you're	16:46	12	as the client directs up to a six-month period."	16:48
13	getting at?	16:46	13	Do you see that?	16:48
14	BY MR. GRENDI:	16:46	14	A. Yes.	16:48
15	Q. Let me try it again. Looking at this	16:46	15	Q. Did Strategic Vision deliver weekly	16:49
16	first full paragraph on the second page, it says:	16:46	16	reports on tracking research per individual subject	16:49
17	"The contractor will produce a progress report on	16:46	17	during the first month of the agreement?	16:49
18	this financial forensic research each week in the	16:47	18	A. No.	16:49
19	first month, one preliminary report in the first	16:47	19	Q. Okay. Did there come a time when	16:49
20	month, and one comprehensive historical research	16:47	20	Strategic Vision delivered a 60-gigabyte hard drive	16:49
21	report within three months and with update reports	16:47	21	of data to Eastern Profit?	16:49
22	sin each following month. The client may require	16:47	22	A. Yes.	16:49
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1	Q. And what was on that hard drive?	16:49	1	A. Is this relevant?	16:51
2	A. It's lots of junk information.	16:49	2	Q. Well, that's what I'm going to get at	16:51
3	Q. Was any of that information the kind of	16:49	3	here, because my understanding would probably be that	16:51
4	useful reporting that Eastern Profit would have	16:49	4	you don't want to reveal the name of that entity.	16:51
5	expected under this agreement?	16:49	5	A. No.	16:52
6	MR. GREIM: Objection, foundation, calls for	16:49	6	Q. Okay. Is that because it's normally	16:52
7	opinion.	16:49	7	confidential; you don't disclose the dealings of	16:52
8	THE WITNESS: No.	16:49	8	private investigatory research clients that you're	16:52
9	BY MR. GRENDI:	16:49	9	working with with Strategic Vision?	16:52
10	Q. Okay. I believe you testified before	16:49	10	A. Correct.	16:52
11	that you had heard that Team 2 found evidence of --	16:50	11	MR. GRENDI: So, Attorney Greim, we can talk	16:52
12	strike that.	16:50	12	about whether you're going to try to use that in	16:52
13	Did you ever hear that Team 2 of Strategic	16:50	13	damages and we can talk about who this client is and	16:52
14	Vision's team found evidence of Social Security	16:50	14	find out information about it or you can -- we can	16:52
15	number fraud or human trafficking or customs fraud?	16:50	15	lay off on that and maybe talk to your client about	16:52
16	A. Say that again.	16:50	16	it.	16:52
17	Q. Sorry. Did there ever come a time when	16:50	17	MR. GREIM: Yeah. Let's just -- let's take	16:52
18	you heard from Strategic Vision that its second team	16:50	18	one minute.	16:52
19	-- they call it Team 2 -- had found evidence of	16:50	19	MR. GRENDI: Sure. Off the record.	16:52
20	Social Security fraud, human trafficking, or customs	16:50	20	VIDEOGRAPHER: Going off the record. The	16:52
21	fraud concerning the subjects of the research	16:50	21	time is now 4:54 p.m.	16:52
22	agreement?	16:50	22	[Mr. Greim confers with Ms. Wallop and Mr.	16:52
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1	A. Yes, but I don't hear the Team 2, that	16:50	1	Waller.]	16:54
2	term. I was not familiar with the Team 2.	16:50	2	VIDEOGRAPHER: We are back on the record.	16:54
3	Q. Let's just say Strategic Vision. Did	16:51	3	The time is now 4:57 p.m.	16:55
4	Strategic Vision tell you it had found that kind of	16:51	4	BY MR. GRENDI:	16:55
5	information?	16:51	5	Q. So, Mr. Han, if you would please	16:55
6	A. Yes.	16:51	6	identify the client or potential client from Taiwan	16:55
7	Q. They did ever give you any documents to	16:51	7	that you spoke of politically concerning a newspaper	16:55
8	prove that or show that that was the case?	16:51	8	article in "Politico".	16:55
9	A. No.	16:51	9	A. There is a -- I saw that article. I	16:55
10	Q. No. Okay. And the whole point of this	16:51	10	didn't know what it referred to. They specifically	16:55
11	agreement was to get that, like you said, the	16:51	11	talked about the Taiwan project?	16:55
12	concrete evidence that there was corruption in the	16:51	12	Q. No, no. I'm sorry. You know what?	16:55
13	CCP. Right?	16:51	13	Let's strike that question. I'll start over.	16:55
14	A. Correct.	16:51	14	what is the name of the entity you and	16:55
15	Q. But that was never delivered under this	16:51	15	Strategic Vision have been working on that comes from	16:55
16	agreement, was it?	16:51	16	Taiwan? Who is that?	16:55
17	A. No.	16:51	17	A. There are several. The Taiwan National	16:55
18	Q. I'll ask about this one, but I think	16:51	18	Security Council and Taiwan DPP, which is the ruling	16:55
19	we're going to have to eventually go off the record	16:51	19	party, and the embassy here.	16:55
20	on it. What is the name of project in Taiwan that	16:51	20	Q. And is Strategic Vision trying to	16:55
21	you were talking about with Attorney Greim just	16:51	21	solicit business from those entities?	16:55
22	before the break?	16:51	22	A. Correct.	16:56
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